

From: "Hilman, Richard" <HILMANR@metro.net>
To: "'IRP-EIR@san.lacity.org'" <IRP-EIR@san.lacity.org>
Date: Tue, Feb 28, 2006 6:05 AM
Subject: Comments for City of L.A. Integrated Resources Plan DEIR

Transmitting on behalf of Susan Chapman

1. Susan Chapman
2. One Gateway Plaza; mailstop 99-23-2; Los Angeles, CA 90012
3. 213-922-6908
4. L.A. County Metropolitan Authority (METRO)

<<LA City IRP 2006.pdf>>

CC: "Chapman, Susan" <ChapmanS@metro.net>

Letter AJ12. Signatory – Metropolitan Transportation Authority



February 27, 2006

Jawahar P. Shah
City of Los Angeles
Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, CA 90065

Dear Mr. Shah:

Los Angeles County Metropolitan Transportation Authority (Metro) is in receipt of the Draft EIR for the Integrated Resources Plan of the City of Los Angeles, SCH 2004071091. This letter conveys recommendations concerning issues that are germane to Metro's statutory responsibilities in relation to the proposed project.

The TIA prepared for the Draft EIR contains analysis that satisfies the traffic requirements of the proposed project, however, elements of the transit analysis are absent, specifically:

1. Three of the four Alternatives discussed in the Plan involve the expansion of the Tillman water reclamation plant, which is located adjacent to and southerly of the Metro Orange Line as it courses through the Sepulveda Basin Recreation Area.
 - a. Section 3.12.2.2: The existence of the operating Metro Orange Line and adjacent parallel City bikeway should be acknowledged as one of the adjacent land uses for Tillman. See page 3.12-4; the Orange Line is between the National Guard facility and Victory Boulevard, north of Tillman. Because the existence of the Orange Line is not recognized, it is not considered in any analysis of potential impacts throughout this Report. It should probably be identified in Figure 3.12-2. The right of way is illustrated (north of "National Guard" and east of "I-405 San Diego Fwy") and could easily be labeled.
 - b. Section 3.16.2.2: As well as impeding access to recreational uses in the Sepulveda Dam Recreation Area, increase in construction traffic from the Tillman expansion could also impede access to the Metro Orange Line bikeway, and should be mentioned. There wouldn't be any impact on traffic due to operations.
 - c. Section 3.17.2.2: Arterial roadways will be expected to handle Project-related traffic. Construction haul routes will be designated, and approved, by the City. A specific restriction should be indicated that no haul route shall include the City's private access to the Tillman Sewer Receptor Facility, identified as Densmore Road. This is a private roadway across the Orange Line busway and bikeway, and the level of construction traffic anticipated in the DEIR would seriously impact Orange Line operations.
 - d. Section 3.17.3.2: (page 3.17-30) Again, propose a specific restriction against using Densmore Road for construction traffic.
 - e. Table 3.17-23 (page 3.17-76) should indicate "potentially adverse impact during construction" under Transportation Safety for the Tillman expansion component. This is due to potential for up to 104

AJ12-1

AJ12-2

AJ12-3

AJ12-4

Letter AJ12. Signatory – Metropolitan Transportation Authority
Page 2
Response to Comment AJ12-1

The commenter points out that the Metro Orange Line and parallel bikeway lie north of the Tillman Water Reclamation Plant, between the National Guard facility and Victory Boulevard. The Metro Orange Line and parallel bikeway are located off-street immediately south of Victory Boulevard. The Metro Orange Line operates in a separate right-of-way and the crossing at Woodley Avenue is controlled by traffic signals, coordinated with the signal at Woodley Avenue and Victory Boulevard, with signal priority given to buses using the Metro Orange Line. Bus headways on the Metro Orange Line are approximately five to ten minutes in each direction throughout the day. The proposed components at Tillman would be confined to the plant boundary or at the cricket field immediately east of the plant. To the extent that Project-related traffic crosses these facilities, it would do so at these fully controlled intersections in the same way that all other traffic does. Given the presence of standard traffic control devices and road markings at this location, the addition of a modest amount of traffic during the proposed construction activities at Tillman would not result in a significant traffic impact at this location. Section 3.12.2.2 text and Figure 3.12-2 of the Draft EIR has been revised to include the Metro Orange Line and bikeway (Section 2 of this Final EIR).

The commenter states that the Draft EIR analysis does not consider potential impacts to these facilities. Vehicular access to Tillman is principally from a driveway on Woodley Avenue, which connects to Victory Boulevard and Burbank Boulevard. Both routes (north on Woodley Avenue to Victory Boulevard and south on Woodley Avenue to Burbank Boulevard) are typically used. A private access road is also available opposite Densmore Avenue. During extreme winter storm conditions, nearby segments of Burbank Boulevard (between I-405 southbound ramps and Havenhurst Avenue) and Woodley Avenue (south of Victory Boulevard) are subject to closure due to inundation. When Burbank Boulevard is closed, site-generated traffic necessarily uses the route on Woodley Avenue to Victory Boulevard. At times when Tillman is completely inaccessible through Woodley Avenue, the private access road across the Orange Line opposite Densmore Avenue is used, because it is the only available route.

Response to Comment AJ12-2

The comment states that the increase in construction traffic at Tillman could impede access to the bikeway adjacent to the Metro Orange Line. This off-street bikeway is also used by joggers, skaters and other pedestrians. The intersection of Woodley Avenue and Victory Boulevard is fully controlled by a traffic signal, as described in the response to comment AJ12-1. The path of the bikeway brings cyclists to a marked crosswalk on the south leg of Woodley Avenue and Victory Boulevard, where they may cross Woodley Avenue during the east-west signal phase. The location of the stop bar on the northbound approach to this intersection provides that vehicles on Woodley Avenue will not obstruct the passage of cyclists.

Response to Comment AJ12-3

The commenter requests that the private access road opposite Densmore Avenue be specifically excluded from haul routes to be used by construction-related traffic. As stated on page 3.17-2 of the Draft EIR, “arterial roadways in the vicinity, including Victory Boulevard, Woodley Avenue and Burbank Boulevard, … would be expected to carry Project-related traffic.” This is consistent with the City’s policy to allow truck traffic on major and secondary arterials. When the primary access point to Tillman (on Woodley Avenue) is inaccessible due to inundation, or as otherwise necessary, the minor private access road opposite Densmore Avenue is used for access to Tillman. Because it is the policy of the City to allow trucks to travel in a “reasonable fashion” to and from a work site, the use of Densmore Avenue may be used as a haul route. The intersection formed where this minor private access road crosses the Metro Orange Line is controlled by a fully actuated traffic signal with bus priority (unlike some other private access roads that cross the Metro Orange Line) to ensure the safe and efficient movement of vehicles there. The intersection of Victory Boulevard and Densmore Avenue is also controlled by a traffic signal. If the use of this minor private access road occurs, the City would coordinate with Metro to limit the disruption to busway traffic.

Response to Comment AJ12-4

The commenter suggests that Table 3.17-23 of the Draft EIR be revised to state that there could be potentially adverse impacts during construction of the proposed Tillman expansion due to the addition of up to 104 one-way daily truck trips across the Metro Orange Line during the peak phase of construction (a period of four months). It should be noted that the estimated truck trips generated during each phase of construction would be dispersed over the course of an entire day. As stated in the response to comments AJ12-1 and AJ12-2, there are two routes typically available into and out of Tillman (Woodley Avenue via either Victory Boulevard or Burbank Boulevard), both of which are suitable for use by construction traffic. The origin or destination of each truck trip would dictate whether it would use Victory Boulevard or Burbank Boulevard to reach Woodley Avenue. The presence of standard traffic signals at the intersection of Woodley Avenue and Victory Boulevard, and the fact that signal priority is given to buses, would avoid any adverse impact to transit and cyclists at this location.

The above notwithstanding, when the construction traffic management plan for the proposed improvements to Tillman is prepared, the City may choose to prohibit the use of Victory Boulevard as a the haul route for trucks, except when Burbank Boulevard is closed due to inundation.

AJ12-4

one-way truck trips per day during peak construction period, all of which could be crossing the busway at Woodley if coming from the north (see Page 3.17-30 above).

2. Two other issues, unrelated to Orange Line operations:

- a. Sewage interceptor lines are also considered in this Report. One of them, the Valley Spring Lane (VSLIS) would cross the Metro Red Line if constructed (see Section 2.2.2.1, page 2-47).
- b. Another, referred to as the Glendale-Burbank Interceptor Sewer (GBIS) north alignment, parallels the SR-134 Freeway, and could possibly impact the planned SR-134 Transitway ("other" projects beyond Strategic Plan) (see Section 2.2.1.10, page 2-39; Figure 3-17.2 and Section 3-17.3.2, page 3.17-66).
- c. Not mentioned in the DEIR, and should be, is the fact that both the north and south alignments of the GBIS would also cross the Metro Red Line.

These crossings should be kept in mind for closer scrutiny in event the City follows through with plans for construction.

This analysis should be included in the Final EIR. Metro looks forward to reviewing the Final EIR. If you have any questions regarding this response, contact me at 213-922-6908 or by email at chapmans@metro.net. Please send the Final EIR to the following address:

Metro CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Susan Chapman

Sincerely,



Susan F. Chapman
Program Manager, Long Range Planning

Response to Comment AJ12-5

The commenter notes that the alignment of the proposed VSLIS would cross the Metro Red Line subway tunnel. The presence of this facility is known and will be carefully considered during the design of the VSLIS, which is a program-level component that would undergo additional future site-specific environmental documentation (Sections 1.2.2 and 3.1.2 of the Draft EIR).

Response to Comment AJ12-6

The commenter notes that the construction of the GBIS North Alignment could affect the planned SR-134 Transitway, described as an "other" project beyond the current Strategic Plan. No further information was provided by the commenter regarding the SR-134 Transitway project and it was not found in the summary of the current Long-Range Plan available at the MTA website. It is noted that the segment of SR-134 that lies near the proposed GBIS North Alignment currently provides high-occupancy vehicle lanes. The construction of GBIS is now contemplated to occur between 2011 and 2014. As detailed design proceeds, the City of Los Angeles will coordinate with other public agencies regarding potential conflicts with existing projects.

The commenter notes that the proposed GBIS alignments would cross the Metro Red Line. Section 2.2.1.10 of the Draft EIR has been revised to note the fact the either GBIS alignment would cross the Metro Red Line (Section 2 of this Final EIR).

Response to Comment AJ12-7

The comment is noted and is included in this Final EIR for review and consideration of decisionmakers.

CITY OF BURBANK
OFFICE OF THE CITY COUNCIL

2012

March 2, 2006

Jawahar P. Shah
City of Los Angeles
Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, California 90065

Dear Mr. Shah:

The City of Burbank (Burbank) has been informed that the City of Los Angeles is considering a new alternative additional alignment for the Glendale-Burbank Interceptor Sewer (GBIS) as a part of the Draft Environmental Impact Report (Draft EIR). It is our understanding that this new "hybrid" alignment would connect the eastern portion of the GBIS South Alignment along Forest Lawn Drive with the western portion of the GBIS North Alignment in Riverside Drive through Clybourn Avenue, Rose Street, or Pass Avenue.

AJ13-1

The Draft EIR fails to disclose and analyze all potentially significant adverse environmental impacts of the GBIS hybrid alignment. The Draft EIR also fails to provide a comparative analysis of the significant adverse impacts of the hybrid alignment to the other GBIS alignment alternatives.

AJ13-2

Further, the Draft EIR must be recirculated for public review and comment after the analysis of the hybrid alignment is made because substantial new information will be required to address the City's comments (see 14 Cal. Code Regs. § 15088.5). Failing to recirculate the Draft EIR after it is revised to: analyze the hybrid alignment, identify the preferred alternative, preferred GBIS alignment and environmentally superior alternative; adequately address noise, air quality and traffic impacts; and to analyze impacts to human health from exposure to hazardous materials will deprive the public of a meaningful opportunity to review this new information.

275 E. Olive Avenue • P.O. Box 6459 • Burbank, California 91510-6459 • (818) 238-5751 • FAX (818) 238-5757

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Letter AJ13. Signatory – City of Burbank

Response to Comment AJ13-1

The City of Burbank submitted six separate comment letters on the Draft EIR that focus on the proposed Glendale-Burbank Interceptor Sewer (GBIS) analyzed in the Draft EIR for the City of Los Angeles' Wastewater Integrated Resources Plan (IRP). Copies of the other six letters and the responses to them are in AJ1, AJ22, AJ30, AJ31, AJ32, and AJ36.

Section 2.2.1.10 of the Draft EIR discusses and evaluates in detail the anticipated environmental effects of the GBIS North Alignment and the GBIS South Alignment. At the time of the release of the Draft EIR, the City of Los Angeles as the Lead Agency for the IRP EIR had evaluated two GBIS alignments. These two proposed alignments were assessed to ensure that adequate public comment was received prior to making a determination on the GBIS alignment that would be eventually recommended for implementation in this Final EIR. During the public comment period on the Draft EIR, numerous comments were received on the GBIS alignments, including the six comment letters submitted by the City of Burbank during the public comment period. As discussed in Section 1.3 of this Final EIR, the City of Los Angeles met with City of Burbank representatives to understand better their concerns about the alignments. On the basis of these meetings (see Section 1.3) and on other comments received on the Draft EIR, City of Los Angeles staff has recommended a GBIS alignment that combines portions of the GBIS North Alignment and the GBIS South evaluated in the Draft EIR. This staff recommended GBIS Alignment and the rationale for its selection is discussed in detail in Section 1.5.2.2 of this Final EIR.

As discussed in Section 1.5.2.2 of this Final EIR, the staff recommended GBIS Alignment (or the commenter's referenced "hybrid alignment") would connect the eastern portion of the GBIS South Alignment with the western portion of the GBIS North Alignment with a short section of tunnel beneath Pass Avenue in the City of Burbank. As explained in the same Final EIR section, the staff recommended GBIS Alignment minimizes the potential for impacts that were raised by residents and stakeholders along both alignments.

If you have questions for City of Burbank staff, please contact Rodney Andersen at (818) 238-3931.

Sincerely,



Jeff Vander Boght
Mayor



Dave Golonski
Council Member



David W. Gordon
Council Member



Marsha R. Ramos
Council Member

c: Bonnie Teaford, Interim Public Works Director
Rodney Andersen, P.E., City of Burbank Public Works Department

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Letter AJ13. Signatory – City of Burbank

Page 2

Regarding the comment of comparing the GBIS alignments, the various resource sections in Section 3 of the Draft EIR evaluate the impacts associated with both the GBIS North Alignment and the GBIS South Alignment, and in doing so have analyzed the impacts of the staff recommended GBIS Alignment, which comprise portions of both the GBIS North and South Alignments. In addition, the GBIS alignment is included as a feature of all four of the Project Alternatives evaluated in the EIR (refer to Section 2.2.1.10 of the Draft EIR for a description of the GBIS alignment). As noted in that section, the Draft EIR evaluates two GBIS alignments. One is a northern alignment and the other is a southern alignment. Because each of the EIR's project-level alternatives (see Section 2.3 of the Draft EIR) comprises various systemwide components, a determination of the Environmentally Superior Alternative is made among the alternatives, not among the subsets or components of the alternatives. As discussed in Executive Summary (Section ES1.9) of the Draft EIR, the Environmentally Superior Alternative is Alternative 1.

As a note, the City has identified Alternative 4 as the Recommended Alternative for approval and implementation (see Section 1.5 of this Final EIR for a description of the Recommended Alternative and its selection process), and this Alternative includes the identification of the staff recommended GBIS Alignment as preferred. Also see response to comment AJ-1.

Response to Comment AJ13-2

The staff recommended GBIS Alignment discussed in detail in Section 1.5.2.2 of this Final EIR does not constitute new information. As discussed in response to comment AJ1-1 and AJ13-1, the staff recommended GBIS Alignment is a combination of the two GBIS alignments analyzed in the Draft EIR. During the public comment period for the Draft EIR, the City received numerous comments expressing concerns associated with the GBIS North Alignment and the GBIS South Alignment. In response to these concerns, the City combined these two GBIS alignments in a manner that reduces the majority of potential impacts expressed in the comment letters (see Section 1.5.2.2 of this Final EIR). The staff recommended GBIS

Alignment would comprise the GBIS alignments evaluated in the Draft EIR because it would connect the eastern portion of the GBIS South Alignment with the western portion of the GBIS North Alignment with a short section of tunnel beneath Pass Avenue in the City of Burbank. As described in the response to AJ13-1 above and in Section 1.5.2.2 of this Final EIR, the type and intensity of the impacts associated with the tunnel beneath Pass Avenue would be similar to those of the GBIS alignments described in the Draft EIR. As such, the staff recommended GBIS Alignment does not include new significant impacts, would not result in substantial increases in the severity of impacts from those described in the Draft EIR, and would not represent substantial new information. The staff recommended GBIS Alignment would result in reduced potential for impacts when compared to the GBIS North Alignment or GBIS South Alignment. As such, the staff recommended GBIS Alignment would not warrant recirculation of the Draft EIR.

Section 1.2.2 of the Draft EIR states that the City of Los Angeles would select a Preferred Alternative after circulation of the Draft EIR, but prior to certification of this Final EIR. Consistent with this, and as described in Section 1.5 of this Final EIR, following the close of the public comment period for the Draft EIR, the City selected Alternative 4 as the Recommended Alternative for implementation. As part of the Recommended Alternative, City staff recommended a combined GBIS Alignment, as described in Section 1.5.2.2. As mentioned above, the staff recommended GBIS Alignment would result in a reduced potential for impacts when compared to the GBIS North Alignment or the GBIS South Alignment (see Section 1.5 for further details). For a response to the comment on the Environmentally Superior Alternative, see response to comment AJ1-1. In that response, it is noted that the Draft EIR determined that Alternative 1 is the Environmentally Superior Alternative and the determination of making that assessment is one that is made from among the Project Alternatives, not from among the components of the alternatives.

Sections 3.4, 3.13, and 3.17 of the Draft EIR respectively discuss the air quality, noise, and traffic impacts of the Project Alternatives. In addition, the commenter is referred to responses to comments AJ1-1 through AJ1-24, which support the adequacy of the analysis of the GBIS alignments, including concerns about human health impacts related to the exposure to hazardous materials. As is demonstrated in the referenced sections the Draft EIR, the referenced responses to comments, and other information herein, recirculation of the Draft EIR is not warranted because no new significant impacts are identified, substantial increases in the severity of the impacts disclosed in the Draft EIR would not occur, and addressing the comments on the Draft EIR has not resulted in substantial new information.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
AQMD
 (909) 396-2000 • www.aqmd.gov

FAXED: March 2, 2006

March 2, 2006

Mr. Jawahar P. Shah
 Public Works, Bureau of Sanitation
 Wastewater Engineering Services Division
 City of Los Angeles
 2714 Media Center Drive
 Los Angeles, CA 90065

Draft Environmental Impact Report (Draft EIR) for the
 Proposed Integrated Resources Plan

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

AJ14-1

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph. D.
 Program Supervisor, CEQA Section
 Planning, Rule Development & Area Sources

Attachment

SS:GM:

LAC051201-01
 Control Number

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|------------------|--------------------|---------|--------------|--------------|--------------|
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| Post-it Fax Note | 7671 | From | GORDON MIZE | | |
| To | MR JAWAHAR P. SHAH | Co/Dep: | Public Works | CEQA Section | SCAQMD-CEQA |
| Phone # | 323-342-6253 | | | Phone # | 909-396-3302 |
| Fax # | 323-342-6210 | | | Fax # | 909-396-3324 |

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Letter AJ14. Signatory – South Coast Air Quality Management District

Response to Comment AJ14-1

The City will provide SCAQMD with the written proposed response to comments pursuant to Public Resources Code Section 21092.5.

Mr. Jawahar P. Shah

-1-

March 2, 2006

SCAQMD Permit Requirements

1. Wastewater treatment upgrades/expansions involving new equipment and structures would trigger pre-construction permit review for compliance with AQMD Regulation XIII, including BACT, and Regulation XIV, including TBACT.
- Hydrocarbon emissions increases at Hyperion/Tillman/LA Glendale may require additional treatment equipment to be installed along with the proposed odor control device upgrades and new installations. In addition to carbon adsorption, LA City should consider biological treatment of hydrocarbons.
 - Emissions from the installation of primary clarifiers at Tillman's and LA-Glendale's proposed expansions will require covers and venting to control.
2. Temporary releases of emissions and odors during construction, including water and gas conveyance tie-ins, should be minimized to the maximum extent by use of scheduling and odor control equipment. Releases of untreated digester gas from in-plant sources are not allowed under current permits to construct and operate.
3. Sewer interceptor realignments may require temporary odor control equipment during construction and E&C encourages LA City, wherever feasible, to schedule and engage in construction activities and to locate odor control equipment with a consideration for odor minimization with respect to neighboring commercial, residential, and other sensitive receptors.

AJ14-2

Letter AJ14. Signatory – South Coast Air Quality Management District

Page 2

Response to Comment AJ14-2

Section 3.4 of the Draft EIR describes SCAQMD permitting requirements associated with the construction and operation of the proposed project components. In addition, mitigation measures AQ-MM-3 (limiting construction activities involving odorous sources) and AQ-MM-4 (limit odorous activities to hours when odors would be at a minimum) specifically address odor issues from the project. Regarding untreated digester gas release from in-plant sources, the existing and proposed digesters would have emergency relief values that would allow pressure to be relieved in the event of pressure buildup. The release of pressure would occur in emergency situations as needed to prevent damage to the digesters and such emergency situations are uncommon events. Comments noted.



California Regional Water Quality Control Board

Los Angeles Region

Recipient of the 2001 Environmental Leadership Award from Keep California Beautiful

C. Lloyd, Ph.D.
enry Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

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Arnold Schwarzenegger
Governor

hand delivered

February 27, 2006

Mr. Jawahar P. Shah
City of Los Angeles
Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, CA 90065

COMMENTS ON "INTEGRATED RESOURCES PLAN DRAFT ENVIRONMENTAL IMPACT REPORT" DATED NOVEMBER 2005

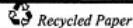
Dear Mr. Shah:

The Los Angeles Regional Water Quality Control Board (Regional Board) thanks the City of Los Angeles (City) for the opportunity to comment on the *Integrated Resources Plan Draft Environmental Impact Report* (EIR), dated November 2005. The EIR analyzes the impacts that would occur from implementing the proposed *Integrated Resources Plan, Facilities Plan* (IRP). The IRP is an integrated wastewater facilities plan that describes the existing wastewater, recycled water, and runoff systems in the City; identifies system inadequacies based on the needs projected for the year 2020; and provides recommended alternatives to address the future needs of the systems.

BACKGROUND

Future population increases in the City would result in increased wastewater flows that must be managed safely. In addition, existing and future laws and regulations are likely to require additional facilities, facility improvements, or new strategies for managing wastewater, recycled water, and urban runoff in the future. The existing wastewater, recycled water, and runoff infrastructure will not be able to meet future needs adequately by the year 2020. The IRP would improve and upgrade the City's wastewater and recycled water systems, and runoff management programs through the year 2020. The four Alternatives all address some combination of 1) publicly owned treatment works expansions/upgrades with increased water recycling and construction of interceptor sewers; 2) managing dry-weather runoff through conservation, low flow diversion to the sewer system, or treatment via urban runoff plants (URPs) or treatment wetlands; 3) managing wet-weather runoff through retention and percolation and/or cisterns, or treatment via URPs; and, 4) groundwater recharge using non-urban runoff.

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Letter AJ15. Signatory – California Regional Water Quality Control Board

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The four proposed Alternatives that are evaluated in this draft EIR include:

- Alternative 1: Expanding the Hyperion Treatment Plant from 450 million gallons per day (MGD) to 500 MGD;
- Alternative 2: Expanding the Tillman Water Reclamation Plant (WRP) from 64 MGD to 80 MGD and the Los Angeles-Glendale WRP from 15 MGD to 30 MGD;
- Alternative 3: Expanding the Tillman WRP to 100 MGD without cisterns installed at government and school sites; and,
- Alternative 4: Expanding the Tillman WRP to 100 MGD with cisterns installed at government and school sites.

GENERAL COMMENTS

Regional Board staff have reviewed the City's draft EIR and have the following general comments pertaining to permitting and storm water issues.

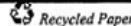
AJ15-1

AJ15-2

AJ15-3

1. Each of the Alternatives in the draft EIR proposes to expand/upgrade either one or more of the inland water reclamation plants (Tillman or Los Angeles-Glendale) or Hyperion. Depending upon the plant upgrades and proposed method of wastewater treatment, the requirement for conducting an Antidegradation Analysis may be triggered. In addition, for each plant a Report of Waste Discharge must be submitted to the Regional Board in order to modify the existing National Pollutant Discharge Elimination System permit to reflect proposed changes to the plant. Depending upon the treatment plant upgrades, the associated water recycling requirements for each plant may also need to be updated.
2. The City is a partner to a recent effort to develop a Los Angeles County Regional Integrated Water Resources Management Plan that will involve more than the City of Los Angeles' Departments. How does the City's Alternatives described in the draft EIR integrate with the Los Angeles County Regional Integrated Water Resources Management Plan?
3. The six urban runoff components appear to be the same for all the Alternatives except the No Project Alternative. The six components, presented for urban runoff management, do not adequately describe the full range of reasonable alternatives. There is a multitude of other structural and non-structural best management practices that can be employed. The controlling element appears to be wastewater treatment, which is where the alternatives are provided. Given that urban runoff management is a critical area for meeting receiving water quality, beneficial uses and Total Maximum Daily Loads (TMDLs), other urban runoff-related alternatives should be explored.

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Letter AJ15. Signatory – California Regional Water Quality Control Board

Page 2

Response to Comment AJ15-1

The City understands the need for modifying existing NPDES Permits and/or Water Recycling Requirements at such time as substantive changes are proposed at any of the treatment plants or in the water recycling facilities. As stated in Table 1-3 (page 1-13), the Draft EIR has identified the Regional Water Quality Control Board as the agency responsible for the requirements associated with the NPDES Permits for construction and improvement at the treatment plants. The Draft EIR describes various alternatives for future upgrades and/or expansion of the Tillman, LAG and Hyperion treatment plants that are all intended to meet anticipated future NPDES permit limits, and therefore, it does not currently anticipate the need to conduct an antidegradation analysis under the alternatives as described. It should be noted that advanced treatment at Tillman or LAG would not be implemented unless there is a trigger (need) to do so. Nonetheless, City will consult with the Regional Board and determine an appropriate course of action for conducting an analysis should the need arise.

Response to Comment AJ15-2

The City's IRP would largely accomplish similar objectives regarding management of runoff and recycled water, except that the City's IRP would focus on measures that can be implemented within City boundaries rather than in unincorporated areas of the County.

Response to Comment AJ15-3

As described in Section 1 of the Draft EIR, the IRP Facilities Plan (and the alternatives defined in that planning process and evaluated in this EIR) is an integrated plan for the wastewater system; therefore, the IRP is designed to meet the future wastewater system need of the City of Los Angeles and its contract agencies in the year 2020, while integrating the recycled water and runoff system. As such, the IRP focuses on the wastewater system, while also identifying strategies to manage future urban runoff. All Project Alternatives meet the project

AJ15-4

4. Alternative 1 is the expansion of the Hyperion Wastewater Treatment Plant's capacity to 500 MGD. Given that Hyperion discharges to Santa Monica Bay, a National Estuary Program water, with many TMDLs, the expansion may cause the exceedance of dry-weather TMDLs. Therefore, the expansion should only be considered, if the City can demonstrate overall TMDL compliance.

SPECIFIC COMMENTS

Section ES1.7.1 Selection of a Preferred Alternative

AJ15-5

5. This section states that the environmentally superior alternative is Alternative 4, which is not consistent with section ES1.9 and the rest of the document which states that Alternative 1 is the environmentally superior alternative.

Section 3.5 Biological Resources

AJ15-6

6. Alternative 1, which was identified as the environmentally superior alternative, would decrease the current discharge to the Los Angeles River by 11 to 13 MGD. The other three alternatives would increase discharges to the Los Angeles River by 3 to 17 MGD. There are two major areas of concern with changes in flow volume in the Los Angeles River. The reduced flow would have the effect of reducing flow through the riparian and wetland habitat through the Glendale Narrows area. Reduced flow in the lower Los Angeles River could affect the amount of algal mat habitat that is used for foraging by shorebirds. The EIR demonstrates that flows would not change enough to cause any adverse impacts based on full implementation of any of the four Alternatives. However, could significant impacts occur during the construction or implementation of any one component due to reductions in flow to the Los Angeles River? This issue was not fully addressed in the draft EIR.

AJ15-7

Section 3.10 Hazards and Hazardous Materials

AJ15-8

7. The draft EIR states that rupture or severe distortion of the proposed sewer pipelines could occur at the crossing of an active fault. The draft EIR indicates that the potential for damage to pipelines would be reduced by design standards, but no details about specific techniques and their effectiveness are provided. The leaks from broken sewer pipelines could have major potential impacts to surface and groundwater resources.
8. The draft EIR states that excavations associated with the proposed infrastructure, such as pipes, could be from 15 to 180 feet deep. Deep excavations may cause the shallow groundwater contamination migrating downward to the deeper higher quality aquifer. Preventive measures may need to be considered prior to excavation.

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Letter AJ15. Signatory – California Regional Water Quality Control Board

Page 3

objectives (Section 1.3 of the Draft EIR), but vary in the extent that improvements are made to the wastewater system, while enhancing the efficient use of water resources through conservation, recycling and the beneficial use of stormwater. Although the Project Alternatives involve similar urban runoff-management components, there are distinct differences among the four alternatives, such as in how and to what extent wastewater and urban runoff is managed; hence, a full range of reasonable alternatives has been analyzed in the Draft EIR. In addition, the Project Alternatives do not preclude the City from exploring and implementing other urban runoff-related alternatives or other structural and nonstructural BMPs as desired and/or required.

Response to Comment AJ15-4

The need to expand Hyperion is predicated on future wastewater flows. Thus, if future wastewater flows trigger increased flows to the extent that additional treatment capacity is warranted to prevent overflows, capacity will be added. Effluent discharges to the Santa Monica Bay occur through an outfall that extends 5 miles from the shore. Because the Santa Monica Bay Beaches Bacteria TMDL would measure water quality at the shoreline, the effluent discharges are not expected to affect compliance with the bacteria TMDL. In addition, low-flow diversions of dry weather runoff to the sewer system would be treated at Hyperion. Thus, treatment capacity at Hyperion would facilitate compliance with TMDLs. It is important to note that the Recommended Alternative would add treatment capacity to Tillman to provide an opportunity to maximize recycled water reuse.

Response to Comment AJ15-5

Comment noted. Section 1.7.1 of the Draft EIR (see Section 2 of this Final EIR) has been revised to reflect Alternative 1 as the Environmentally Superior Alternative.

Response to Comment AJ15-6

Construction of capacity increases at Tillman is not expected to result in reductions of effluent discharges to the Los Angeles River because expansion would occur by adding additional treatment modules without disrupting the treatment processes at existing modules.

Response to Comment AJ15-7

Section 3.11.3.3, Hydrology and Water Quality, in the Draft EIR (see discussion under Impact WQ-3), identifies a potentially significant impact to groundwater quality that could occur from a rupture along the NEIS II alignments if a catastrophic seismic event occurs along the Hollywood Raymond fault. To mitigate for this potential impact, the City would implement mitigation measure GEO-MM-1, as described on page 3.9-52 of the Draft EIR. Each of the three bullets under GEO-MM-1 describe design approaches that would minimize the potential for damage of NEIS II in the event of an earthquake along the Hollywood Raymond Fault, and these measures include use of “two-linings...to spread the offset over a large number of joints,” use of a “vault reach...to allow the carrier pipe to deform across the zones of offset in a controlled manner,” and use of a “larger tunnel and lining diameter for the reach that crosses the fault zone.” The intent of these mitigation measures is to accommodate potential differential displacement across the fault zone that could damage the tunnel. The design features would be based on the anticipated potential displacement along the fault. Because fault displacement cannot be predicted, there is no way to determine the effectiveness of such design measures until after a fault displacement occurs and the sewer can be inspected. Although this mitigation measure will reduce the potential for damage to NEIS II along the fault, the Draft EIR identifies a remote, yet potentially significant, residual impact because complete effectiveness of GEO-MM-1 in the event of fault displacement cannot be ensured.

Response to Comment AJ15-8

Comment noted. To keep the shafts water tight, the shaft walls would be constructed of slurry walls or secant piles. These construction methods place grout (to support the shaft walls) directly against the surrounding soil, which prevents space around the shaft walls. Because of this, the shafts would not serve as pathways for groundwater contamination to migrate downwards. For maintenance hole structures, steel casings are installed before the maintenance hole structures are placed. The steel casings are installed by inserting an auger in to the case and drilling into the soil. As the drilling progresses downward, the casing is driven downward. The auger hole has a smaller diameter than the outside diameter of the casing and this would prevent spaces around the outside of the casing. This would also prevent contamination from migrating downward along the case. In addition, grout can be injected along the maintenance hole column prior to case installation to support the surrounding soil. Such methods would produce a water-free column that would prevent groundwater from reaching the case or migrating downward. It should be noted that although the depths of the sewer tunnel could reach up to 180 feet beneath the ground surface and perched water may exist, soil profiles indicate that there are no distinct aquifers along the sewer alignments between the bedrock and ground surface. The shafts and maintenance hole structures could extend partially into bedrock (depending on the sewer profile) but would not span different aquifers. Thus, migration of contaminants to deep aquifers would not occur.

February 27, 2006

AJ15-9

ADDRESSING A KEY OBJECTIVE – COMPLIANCE WITH TMDLs

The City of Los Angeles has repeatedly indicated to the Regional Board that the IRP will be the main tool used to comply with the Santa Monica Bay Beaches Bacteria TMDL, Marina del Rey Bacteria TMDL, Los Angeles River Metals TMDL, and future TMDLs currently been developed such as the Ballona Creek Bacteria TMDL. Based on these assertions by the City, the Regional Board has allowed extended implementation schedules for these TMDLs. The EIR provides a statement of project objectives to help the City evaluate the proposed Alternatives and select the preferred Alternative. However, facilitating compliance with the effective TMDLs is not specifically included as one of the project objectives. There is a no connection made between how the IRP will be used to achieve compliance with the TMDLs. This key objective should be discussed in the EIR and integrated into the rational for selecting the preferred Alternative.

If you have any questions regarding our comments, please do not hesitate to contact Rebecca Christmann at (213) 576-6756 or rchristmann@waterboards.ca.gov.

Sincerely,


Jonathan S. Bishop
Executive Officer
*Chief Deputy S.O.
f.e.*

Letter AJ15. Signatory – California Regional Water Quality Control Board

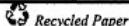
Page 4

Response to Comment AJ15-9

The IRP document considers TMDLs through the inclusion of water quality objectives as one of the parameters in its alternatives. The IRP approach is the primary methodology that the City will use to comply with current and future TMDLs. The City will develop specific implementation plans for TMDLs as they are issued by the Regional Board. These implementation plans will use the IRP approach and will address the specific requirements of each specific TMDL. Meeting TMDL requirements will be one way to comply with water quality objectives of the City.

RECEIVED
2006 FEB 27 PM b: 17
WASTEWATER ENG. SVCS. DIV.

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.



15 March 2006

Mr. Jawahar P. Shah
City of Los Angeles Dept of Public Works
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, CA 90065

RE: Comments on the Notice of Availability of a Draft Environmental Impact Report for the Integrated Resources Plan SCAG No. I20050792

Dear Mr. Shah:

Thank you for submitting the Notice of Availability of a Draft Environmental Report for the above-mentioned plan to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have determined that the proposed Project is regionally significant per California Environmental Quality Act (CEQA) Guidelines (Section 15206). SCAG bases review of such projects on its adopted regional plans:

**Destination 2030: 2004 Regional Transportation Plan (RTP)
Regional Comprehensive Plan and Guide (RCPG) –1996 Version
Compass Growth Vision**

CEQA requires that EIRs discuss any inconsistencies between the proposed project and the applicable general plans and regional plans (Section 15125 [d]). Please state separately how the proposed plan will or will not support each regional plan. Please cite specific policies in the regional plans that the proposed project supports. If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided. Visit www.scag.ca.gov for downloadable versions of these documents. In addition, SCAG offers the following comments:

1. The proposed project should identify and implement BMPs to provide for both short and long-term stormwater management during project construction and operation.
2. Long-term sediment control shall include an erosion control and revegetation program designated to allow reestablishment of native vegetation and undeveloped areas.
3. Drainage of surface water should, whenever possible, be designed to run through vegetated median strips, in order to provide adequate storage capacity and to provide overland flow, detention and infiltration before it reaches culverts. Detention basins and ponds, aside from controlling runoff rates, can also remove particulate pollutants through settling.

DOCS # 119917v1

Letter AJ17. Signatory – Southern California Association of Governments

Response to Comment AJ17-1

The City understands that SCAG works to maintain a continuous, comprehensive, and coordinated planning process through the publication of the Regional Comprehensive Plan and Guide (RCPG) and Regional Transportation Plan (RTP). Topics of regional significance contained in the RCPG include growth management, regional transportation, air quality, open space management, and water quality. The IRP components and alternatives are infrastructure projects necessary to protect public health and the environment. As described in Section 3.14 of the Draft EIR, the IRP Facilities Plan was developed based on 2001 SCAG projections; therefore, the Project Alternatives would be consistent with RCPG growth management policies. In addition, the IRP, as also described in Section 3.14 of the Draft EIR, used household projections based on the 2001 RTP. Because IRP components and alternatives are not traditional development projects, other RCPG policies, such as air quality core actions, social, political and cultural equity growth management policies, are not applicable. Water quality policies/goals, including watershed management programs and strategies, comprise one of the IRP goals and objectives (Section 1.3 of the Draft EIR). Permanent IRP facilities located in open space areas (i.e., ATF in a regional recreational area, such as Griffith Park) would potentially be inconsistent with policies involving open space accessibility. Section 3.16 of the Draft EIR concluded that if placed on recreational facilities, IRP components would limit the use of and possibly access to a regional recreational facility (i.e. Griffith Park). Even with mitigation, these impacts would be potentially significant (see Section 3.16.2.3 of Draft EIR). In addition, as part of the review process for the Draft EIR, a comment letter was received from the County of Los Angeles Department of Parks and Recreation, a jurisdiction that includes regional facilities, that indicated that no impacts would occur to facilities under its jurisdiction (refer to letter AJ20).

15 March 2006
Mr. Jawahar Shah
Page 2

AJ17-2

4. The EIR should perform a quantitative analysis to determine whether the proposed project would exceed applicable water quality standards into receiving water bodies.

AJ17-3

Please provide a minimum of 45 days for SCAG to review the EIR when this document is available. If you have any questions regarding the attached comments, please contact me at (213) 236-1851. Thank you.

Sincerely,



Brian Wallace
Associate Regional Planner
Intergovernmental Review

Letter AJ17. Signatory – Southern California Association of Governments

Page 2

Response to Comment AJ17-2

As addressed in Section 3.11.3.2 of the Draft EIR, the potential for water quality impacts from IRP components were analyzed. The analysis addressed the implementation of a Storm Water Pollution Prevention Plan (SWPPP), and associated BMPs, under the General Construction Permit that the project would reduce or eliminate pollutant discharges during construction. Other standard construction practices (i.e., Greenbook) include an Erosion Control Plan. Operation would include implementation of a Stormwater Quality Management Program (SQMP), including a Standard Urban Stormwater Mitigation Plan (SUSMP) that designates BMPs to manage and treat stormwater runoff. In addition, as described in the Draft EIR, IRP components and alternatives include, or would require, Regional Board-issued NPDES permit(s) that limit discharge into bodies of water. Therefore, the IRP would not exceed applicable water quality standards at receiving bodies of water. Comment noted.

Response to Comment AJ17-3

The City is providing SCAG with the written proposed response to comments in this Final EIR pursuant to Public Resources Code Section 21092.5.





COUNTY OF LOS ANGELES

DEPARTMENT OF PARKS AND RECREATION

"Creating Community Through People, Parks and Programs"

Russ Guiney, Director

1473

February 27, 2006

Jawahar P. Shah
City of Los Angeles
Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, CA 90065

Dear Mr. Shah:

**NOTICE OF ABILITY-INTEGRATED RESOURCES PLAN (IRP)
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)**

AJ20-1

The Notice of Availability of a DEIR for the IRP has been reviewed for potential impact on the facilities of this Department. Development of the project as described in the Notice will not impact facilities under the jurisdiction of this Department.

Thank you for including this Department in the review of this environmental document. If we may be of further assistance, please contact me at (213) 351-5133.

Sincerely,

Bryan Moscardini
Park Project Coordinator

BM(c:response-LACityIRP)

Letter AJ20. Signatory – County of Los Angeles Department of Parks and Recreation

Response to Comment AJ20-1

Thank you for your review. Comment noted.



WENDY GREUEL
COUNCILMEMBER, SECOND DISTRICT
CITY OF LOS ANGELES
PRESIDENT PRO TEMPORE

468

CITY HALL
200 N. Spring STREET
ROOM 475
LOS ANGELES, CA 90012
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FAX (213) 680-7895

NORTH HOLLYWOOD
6350 LAUREL CANYON BLVD., #201
NORTH HOLLYWOOD, CA 91606
(818) 755-7676
FAX (818) 755-7862

SUNLAND-TUJUNGA
7747 FOOTHILL BOULEVARD
TUJUNGA, CA 91042
(818) 352-3287
FAX (818) 352-8563

February 16, 2006

Jawahar P. Shah
City of Los Angeles Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, CA 90065

Dear Mr. Shah:

I write in extreme opposition to the use of Woodbridge Park for construction activities related to the Glendale-Burbank Interceptor Sewer (GBIS). Parks are undoubtedly among our most valuable quality of life resources, and we as a City must do everything in our power to preserve them.

The Draft Environmental Impact Report (EIR) identifies the impact of construction activities at Woodbridge Park as "potentially significant" even after mitigation measures are implemented (see p. ES-53). Those impacts would include loss of recreational facilities, loss of open space, and destruction of the visual environment around the park.

In all likelihood, use of the Woodbridge Park site would require approval of a Statement of Overriding Considerations (SOC). The SOC would identify the public benefits which would justify the unmitigated impacts on Woodbridge Park. Because there are other sites available, the public-benefits argument must surely fail. Since there is an environmentally superior alternative to the Woodbridge Park site – the neighboring CalTrans site – the City should not approve the SOC. Instead, the City should force the selection of an alternate construction site. I will take every measure available to me to ensure the preservation of Woodbridge Park.

AJ21-1

Sincerely,

WENDY GREUEL
Councilmember, 2nd District

COMMITTEE ASSIGNMENTS
CHAIR: TRANSPORTATION COMMITTEE
VICE CHAIR: BUDGET & FINANCE COMMITTEE
MEMBER: AUDITS & GOVERNMENTAL EFFICIENCY COMMITTEE
MEMBER: ENERGY AND THE ENVIRONMENT COMMITTEE



Letter AJ21. Signatory – Councilmember Wendy Greuel

Response to Comment AJ21-1

Various portions of Section 3 of the Draft EIR address in detail the potential impacts of the construction and operation of the proposed GBIS alignments (including aboveground structures such as shaft sites and ATFs at Woodbridge Park). The analyses include the potential impacts on adjacent land uses related to such resource issues as aesthetics, air quality, land use, noise, public services, recreation, and traffic. As described in Section 1.5.2.2 of this Final EIR, the preferred western terminus of the staff recommended GBIS Alignment is the Caltrans Maintenance Yard. Woodbridge Park is no longer under consideration as a shaft site or for the placement of an air treatment facility.



CITY OF BURBANK
COMMUNITY DEVELOPMENT DEPARTMENT
275 East Olive Avenue, P.O. Box 6459, Burbank, California 91510-6459
www.ci.burbank.ca.us

February 27, 2006

Jawahar P. Shah
City of Los Angeles
Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, CA 90065

Re: Glendale-Burbank Interceptor Sewer (GBIS)
North Alignment-Pollywog Area

Dear Mr. Shah,

AT22-1

At the Burbank City Council meeting on February 21, 2006 several people from the public spoke about soil contamination at the Pollywog Site where an access shaft and air treatment facility is proposed as part of the North Alignment of the Glendale-Burbank Interceptor Sewer (GBIS). The following day the attached cover memo and report were provided to our City Manager and City Council members by one of the people who spoke during oral communications at the City Council meeting the previous evening. The cover memo and attached analysis prepared by American Analytics suggest that soil samples were taken from the Pollywog area located directly adjacent to the Disney Animation Building on the Disney Studio Campus in Burbank.

AJ22-2

The Pollywog area is part of the City of Los Angeles; therefore, we're providing you with a copy of the cover memo and analysis for your review and comments. The City Council has asked that a discussion of this item be scheduled with the Environmental Oversight Committee on April 18, 2006 and we would like to focus that discussion on any comments on the cover memo and analysis you have provided. Two City Council members sit on the Committee, and the agenda and other information for the Committee meeting on April 18th will be distributed to the Committee members on Thursday April 13th, so we would like to receive your comments on or before April 13th.

Please don't hesitate to call me at (818) 238-5278, or email me at rbaker@ci.burbank.ca.us if you have any questions or need any additional information.

Sincerely

Roger Baker

Roger Baker
Deputy City Planner

c. Dennis Barlow, City Attorney

Letter AJ22. Signatory – City of Burbank – Community Development Department

Response to Comment AJ22-1

Your comments are noted.

Response to Comment AJ22-2

Thank you for providing the laboratory testing information regarding the Pollywog site. The laboratory results were forwarded to the City's Department of Recreation and Parks. As a note, the staff recommended GBIS Alignment would not use the Pollywog site (a.k.a. Valley Heart Shaft Site) as a construction site or location for an air treatment facility.

| | | | | | | |
|--------------------------------|---|--------------------------------------|---|----------------------------------|---|-----------------------------------------|
| ADMINISTRATION 818.238.5176 | ❖ | BUILDING 818.238.5220 | ❖ | HOUSING & GRANTS 818.238.5160 | ❖ | LICENSE & CODE SERVICES 818.238.5280 |
| PLANNING 818.238.5250 | ❖ | REDEVELOPMENT AGENCY 818.238.5180 | ❖ | TRANSPORTATION 818.238.5270 | ❖ | WORKFORCE CONNECTION 818.238.JOBS |

Selected *more info.*
Brancho
Residence -

9765 Eton Avenue
Chatsworth
California 91311
Tel: (818) 998-5547
Fax: (818) 998-7258

February 14, 2006

Letter AJ22. Signatory – City of Burbank –
Community Development Department

Page 2

Re : Burbank / Disney
A64201 / 6B01003

Enclosed is an analytical report for the above-referenced project. The samples included in this report were received on 01/31/06 11:45 and analyzed in accordance with the attached chain-of-custody.

Unless otherwise noted, all analytical testing was accomplished in accordance with the guidelines established in our Quality Assurance Program Manual, applicable standard operating procedures, and other related documentation. The results in this analytical report are limited to the samples tested and any reproduction thereof must be made in its entirety.

If you have any questions regarding this report or require additional information please call me at American Analytics.

Sincerely,

Eydie Schwartz

Eydie Schwartz
Project Manager

All testing was done in the "polly wog"
area in less than 9 feet.

Critical Page is Pg. 4

LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06

| Sample ID | Laboratory ID | Matrix | TAT | Date Sampled | Date Received |
|-----------|---------------|--------|-----|--------------|---------------|
|-----------|---------------|--------|-----|--------------|---------------|

7199 Hexavalent Chromium by IC - Low Level

| | | | | | |
|-----------|------------|------|----|----------------|----------------|
| Sample-1A | 6B01003-01 | Soil | 10 | 01/31/06 09:45 | 01/31/06 11:45 |
| Sample-2A | 6B01003-02 | Soil | 10 | 01/31/06 10:00 | 01/31/06 11:45 |
| Sample-4A | 6B01003-03 | Soil | 10 | 01/31/06 10:20 | 01/31/06 11:45 |
| Sample-5A | 6B01003-04 | Soil | 10 | 01/31/06 10:35 | 01/31/06 11:45 |
| Sample-6A | 6B01003-05 | Soil | 10 | 01/31/06 10:45 | 01/31/06 11:45 |

8260B

| | | | | | |
|-----------|------------|------|----|----------------|----------------|
| Sample-1A | 6B01003-01 | Soil | 10 | 01/31/06 09:45 | 01/31/06 11:45 |
| Sample-2A | 6B01003-02 | Soil | 10 | 01/31/06 10:00 | 01/31/06 11:45 |
| Sample-4A | 6B01003-03 | Soil | 10 | 01/31/06 10:20 | 01/31/06 11:45 |
| Sample-5A | 6B01003-04 | Soil | 10 | 01/31/06 10:35 | 01/31/06 11:45 |
| Sample-6A | 6B01003-05 | Soil | 10 | 01/31/06 10:45 | 01/31/06 11:45 |

8270C

| | | | | | |
|-----------|------------|------|----|----------------|----------------|
| Sample-1A | 6B01003-01 | Soil | 10 | 01/31/06 09:45 | 01/31/06 11:45 |
| Sample-2A | 6B01003-02 | Soil | 10 | 01/31/06 10:00 | 01/31/06 11:45 |
| Sample-4A | 6B01003-03 | Soil | 10 | 01/31/06 10:20 | 01/31/06 11:45 |
| Sample-5A | 6B01003-04 | Soil | 10 | 01/31/06 10:35 | 01/31/06 11:45 |
| Sample-6A | 6B01003-05 | Soil | 10 | 01/31/06 10:45 | 01/31/06 11:45 |

CAM Metals Less Hg 6000/7000

| | | | | | |
|-----------|------------|------|----|----------------|----------------|
| Sample-1A | 6B01003-01 | Soil | 10 | 01/31/06 09:45 | 01/31/06 11:45 |
| Sample-2A | 6B01003-02 | Soil | 10 | 01/31/06 10:00 | 01/31/06 11:45 |
| Sample-4A | 6B01003-03 | Soil | 10 | 01/31/06 10:20 | 01/31/06 11:45 |

Eydie Schwartz

Eydie Schwartz
Project Manager

Letter AJ22. Signatory – City of Burbank –
Community Development Department

Page 4

LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06

| Sample ID | Laboratory ID | Matrix | TAT | Date Sampled | Date Received |
|-----------|---------------|--------|-----|----------------|----------------|
| Sample-5A | 6B01003-04 | Soil | 10 | 01/31/06 10:35 | 01/31/06 11:45 |
| Sample-6A | 6B01003-05 | Soil | 10 | 01/31/06 10:45 | 01/31/06 11:45 |

Mercury Total EPA 7470A/7471A

| | | | | | |
|-----------|------------|------|----|----------------|----------------|
| Sample-1A | 6B01003-01 | Soil | 10 | 01/31/06 09:45 | 01/31/06 11:45 |
| Sample-2A | 6B01003-02 | Soil | 10 | 01/31/06 10:00 | 01/31/06 11:45 |
| Sample-4A | 6B01003-03 | Soil | 10 | 01/31/06 10:20 | 01/31/06 11:45 |
| Sample-5A | 6B01003-04 | Soil | 10 | 01/31/06 10:35 | 01/31/06 11:45 |
| Sample-6A | 6B01003-05 | Soil | 10 | 01/31/06 10:45 | 01/31/06 11:45 |

Eydie Schwartz
Project Manager

American Analytics | 9765 Eton Avenue, Chatsworth, California 91311
Tel: (818) 998-5547 | Fax: (818) 998-7258



Project No: NA
Project Name: Burbank / Disney

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06

ANALYTICAL DATA SUMMARY

| Analyte | Sample Name | Result | MRL | Units | Dilution | Prepared | Analyzed | Method |
|---------------------------------------|-------------|--------|-------|-------|----------|----------|----------|----------------|
| Cations by Ion Chromatography | | | | | | | | |
| Chromium (VI) | Sample-1A | 0.047 | 0.040 | mg/kg | 1 | 02/03/06 | 02/06/06 | EPA 7199 |
| Chromium (VI) | Sample-2A | 0.15 | 0.040 | mg/kg | 1 | 02/03/06 | 02/06/06 | EPA 7199 |
| Chromium (VI) | Sample-4A | 0.20 | 0.040 | mg/kg | 1 | 02/03/06 | 02/06/06 | EPA 7199 |
| Semivolatile Organics by GC/MS | | | | | | | | |
| Total Metals CAM 17 | | | | | | | | |
| Mercury | Sample-1A | 0.031 | 0.020 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 7471A |
| Mercury | Sample-2A | 0.051 | 0.020 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 7471A |
| Mercury | Sample-4A | 0.044 | 0.020 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 7471A |
| Mercury | Sample-6A | 0.068 | 0.020 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 7471A |
| Total Metals CAM 17 | | | | | | | | |
| Barium | Sample-1A | 57 | 10 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Chromium | Sample-1A | 7.4 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Cobalt | Sample-1A | 4.2 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Copper | Sample-1A | 7.4 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Lead | Sample-1A | 4.1 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Nickel | Sample-1A | 3.2 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Vanadium | Sample-1A | 21 | 10 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Zinc | Sample-1A | 27 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |

Eydie Schwartz

Eydie Schwartz
Project Manager



Project No: NA
Project Name: Burbank / Disney

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06

ANALYTICAL DATA SUMMARY

| Analyte | Sample Name | Result | MRL | Units | Dilution | Prepared | Analyzed | Method |
|----------|-------------|--------|------|-------|----------|----------|----------|-------------------|
| Arsenic | Sample-2A | 1.6 | 0.50 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Barium | Sample-2A | 190 | 10 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Chromium | Sample-2A | 28 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Cobalt | Sample-2A | 12 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Copper | Sample-2A | 41 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Lead | Sample-2A | 18 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Nickel | Sample-2A | 14 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Vanadium | Sample-2A | 56 | 10 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Zinc | Sample-2A | 72 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Arsenic | Sample-4A | 2.9 | 0.50 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Barium | Sample-4A | 79 | 10 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Chromium | Sample-4A | 13 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Cobalt | Sample-4A | 5.4 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Copper | Sample-4A | 18 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Lead | Sample-4A | 69 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Nickel | Sample-4A | 7.0 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Vanadium | Sample-4A | 23 | 10 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |

Eydie Schwartz

Eydie Schwartz
Project Manager

LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06

ANALYTICAL DATA SUMMARY

| Analyte | Sample Name | Result | MRL | Units | Dilution | Prepared | Analyzed | Method |
|----------|-------------|--------|-----|-------|----------|----------|----------|-------------------|
| Zinc | Sample-4A | 92 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Barium | Sample-5A | 51 | 10 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Chromium | Sample-5A | 4.8 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Cobalt | Sample-5A | 3.5 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Copper | Sample-5A | 5.7 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Lead | Sample-5A | 3.5 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Vanadium | Sample-5A | 17 | 10 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| | Sample-5A | 24 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Barium | Sample-6A | 130 | 10 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Chromium | Sample-6A | 20 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Cobalt | Sample-6A | 9.2 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Copper | Sample-6A | 24 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Lead | Sample-6A | 12 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Nickel | Sample-6A | 12 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Vanadium | Sample-6A | 38 | 10 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |
| Zinc | Sample-6A | 62 | 3.0 | mg/kg | 1 | 02/06/06 | 02/06/06 | EPA 6010B/7000 |

VOCs by GC/MS

Eddie Schwartz
Project Manager



Letter AJ22. Signatory – City of Burbank –
Community Development Department

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Project No: NA
Project Name: Burbank / Disney

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06

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LABORATORY ANALYSIS RESULTS

| | | | |
|------------------|--------------------------------|----------------|------------|
| Project No: | NA | AA Project No: | A64201 |
| Project Name: | Burbank / Disney | Date Received: | 01/31/06 |
| Method: | Semivolatile Organics by GC/MS | Date Reported: | 02/14/06 |
| | | Units: | mg/kg |
| Date Sampled: | 01/31/06 | 01/31/06 | 01/31/06 |
| Date Prepared: | 02/02/06 | 02/02/06 | 02/02/06 |
| Date Analyzed: | 02/06/06 | 02/06/06 | 02/06/06 |
| AA ID No: | 6B01003-01 | 6B01003-02 | 6B01003-03 |
| Client ID No: | Sample-1A | Sample-2A | Sample-4A |
| Matrix: | Soil | Soil | Soil |
| Dilution Factor: | 1 | 1 | 10 |
| | | | MRL |

8270C (EPA 8270C)

| | | | | | |
|-----------------------------|-------|-------|------|-------|------|
| 3,3'-Dichlorobenzidine | <0.40 | <0.40 | <4.0 | <0.40 | 0.40 |
| Acenaphthene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Acenaphthylene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Aniline | <0.20 | <0.20 | <2.0 | <0.20 | 0.20 |
| Anthracene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Azobenzene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Benzidine | <0.40 | <0.40 | <4.0 | <0.40 | 0.40 |
| benzo(a)anthracene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| benzo(a)pyrene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| benzo(b)fluoranthene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| benzo(g,h,i)perylene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Benzoic acid | <1.0 | <1.0 | <10 | <1.0 | 1.0 |
| Benzo(k)fluoranthene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Benzyl alcohol | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| 4-Bromophenyl phenyl ether | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Butyl benzyl phthalate | <0.50 | <0.50 | <5.0 | <0.50 | 0.50 |
| 4-Chloro-3-methylphenol | <0.20 | <0.20 | <2.0 | <0.20 | 0.20 |
| 4-Chloroaniline | <0.40 | <0.40 | <4.0 | <0.40 | 0.40 |
| Bis(2-chloroethoxy)methane | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Bis(2-chloroethyl)ether | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Bis(2-chloroisopropyl)ether | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| 2-Chloronaphthalene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| 2-Chlorophenol | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| 4-Chlorophenyl phenyl ether | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Chrysene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Dibenzo(a,h)anthracene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Dibenzofuran | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |

Eydie Schwartz

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LABORATORY ANALYSIS RESULTS

| | | | | | |
|------------------|--------------------------------|------------|------------|------------|-------------------------|
| Project No: | NA | | | | AA Project No: A64201 |
| Project Name: | Burbank / Disney | | | | Date Received: 01/31/06 |
| Method: | Semivolatile Organics by GC/MS | | | | Date Reported: 02/14/06 |
| | | | | | Units: mg/kg |
| Date Sampled: | 01/31/06 | 01/31/06 | 01/31/06 | 01/31/06 | |
| Date Prepared: | 02/02/06 | 02/02/06 | 02/02/06 | 02/02/06 | |
| Date Analyzed: | 02/06/06 | 02/06/06 | 02/06/06 | 02/06/06 | |
| AA ID No: | 6B01003-01 | 6B01003-02 | 6B01003-03 | 6B01003-04 | |
| Client ID No: | Sample-1A | Sample-2A | Sample-4A | Sample-5A | |
| Matrix: | Soil | Soil | Soil | Soil | |
| Dilution Factor: | 1 | 1 | 10 | 1 | MRL |

8270C (EPA 8270C) (continued)

| | | | | | |
|----------------------------|-------|-------|------|-------|------|
| Di-n-butyl phthalate | <2.0 | <2.0 | <20 | <2.0 | 2.0 |
| 1,2-Dichlorobenzene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| 1,3-Dichlorobenzene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| 1,4-Dichlorobenzene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| 2,4-Dichlorophenol | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Diethyl phthalate | <0.80 | <0.80 | <8.0 | <0.80 | 0.80 |
| 2,4-Dimethylphenol | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| ethyl phthalate | <0.20 | <0.20 | <2.0 | <0.20 | 0.20 |
| ,,Dinitro-2-methylphenol | <0.20 | <0.20 | <2.0 | <0.20 | 0.20 |
| 2,4-Dinitrophenol | <0.40 | <0.40 | <4.0 | <0.40 | 0.40 |
| 2,6-Dinitrotoluene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| 2,4-Dinitrotoluene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Di-n-octyl phthalate | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| 1,2-Diphenylhydrazine | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Bis(2-ethylhexyl)phthalate | <0.20 | <0.20 | <2.0 | <0.20 | 0.20 |
| Fluoranthene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Fluorene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Hexachlorobenzene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Hexachlorobutadiene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Hexachlorocyclopentadiene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Hexachloroethane | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Indeno (1,2,3-cd) pyrene | <0.40 | <0.40 | <4.0 | <0.40 | 0.40 |
| Isophorone | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| 2-Methylnaphthalene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| 2-Methylphenol | <0.20 | <0.20 | <2.0 | <0.20 | 0.20 |
| 3-Methylphenol | <0.20 | <0.20 | <2.0 | <0.20 | 0.20 |
| 4-Methylphenol | <0.20 | <0.20 | <2.0 | <0.20 | 0.20 |

Edie Schwartz
Project Manager

Letter AJ22. Signatory – City of Burbank –
Community Development Department

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LABORATORY ANALYSIS RESULTS

Project No: NA
 Project Name: Burbank / Disney
 Method: Semivolatile Organics by GC/MS

AA Project No: A64201
 Date Received: 01/31/06
 Date Reported: 02/14/06
 Units: mg/kg

| | | | | |
|------------------|------------|------------|------------|------------|
| Date Sampled: | 01/31/06 | 01/31/06 | 01/31/06 | 01/31/06 |
| Date Prepared: | 02/02/06 | 02/02/06 | 02/02/06 | 02/02/06 |
| Date Analyzed: | 02/06/06 | 02/06/06 | 02/06/06 | 02/06/06 |
| AA ID No: | 6B01003-01 | 6B01003-02 | 6B01003-03 | 6B01003-04 |
| Client ID No: | Sample-1A | Sample-2A | Sample-4A | Sample-5A |
| Matrix: | Soil | Soil | Soil | Soil |
| Dilution Factor: | 1 | 1 | 10 | 1 |
| | | | | MRL |

8270C (EPA 8270C) (continued)

| | | | | | |
|--------------------------|-------|-------|------|-------|------|
| Naphthalene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| 4-Nitroaniline | <0.50 | <0.50 | <5.0 | <0.50 | 0.50 |
| 3-Nitroaniline | <0.40 | <0.40 | <4.0 | <0.40 | 0.40 |
| 2-Nitroaniline | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Nitrobenzene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| 2-Nitrophenol | <0.20 | <0.20 | <2.0 | <0.20 | 0.20 |
| 4-Nitrophenol | <0.20 | <0.20 | <2.0 | <0.20 | 0.20 |
| N-Nitrosodimethylamine | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Nitrosodiphenylamine | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| -Nitrosodi-n-propylamine | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Pentachlorophenol | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Phenanthrene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Phenol | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| Pyrene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| 1,2,4-Trichlorobenzene | <0.10 | <0.10 | <1.0 | <0.10 | 0.10 |
| 2,4,5-Trichlorophenol | <0.20 | <0.20 | <2.0 | <0.20 | 0.20 |
| 2,4,6-Trichlorophenol | <0.20 | <0.20 | <2.0 | <0.20 | 0.20 |

| <u>Surrogates</u> | %REC Limits | | | |
|----------------------|-------------|-------|-------|--------------|
| 2-Fluorobiphenyl | 57.1% | 51.4% | 75.4% | 57.8% 43-116 |
| 2-Fluorophenol | 41.4% | 41.4% | 51.5% | 44.4% 21-100 |
| Nitrobenzene-d5 | 51.5% | 48.3% | 56.2% | 52.3% 35-134 |
| Phenol-d6 | 42.1% | 41.5% | 50.5% | 44.8% 10-94 |
| Terphenyl-d14 | 73.7% | 63.0% | 92.4% | 97.5% 33-141 |
| 2,4,6-Tribromophenol | 44.8% | 41.9% | 64.5% | 44.7% 10-123 |

Lydie Schwartz

Lydie Schwartz
Project Manager

**LABORATORY ANALYSIS RESULTS**

Project No: NA
Project Name: Burbank / Disney
Method: Semivolatile Organics by GC/MS

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06
Units: mg/kg

Date Sampled: 01/31/06
Date Prepared: 02/02/06
Date Analyzed: 02/06/06
AA ID No: 6B01003-05
Client ID No: Sample-6A
Matrix: Soil
Dilution Factor: 1

MRL

| 8270C (EPA 8270C) | | MRL |
|-----------------------------|-------|------|
| 3,3'-Dichlorobenzidine | <0.40 | 0.40 |
| Acenaphthene | <0.10 | 0.10 |
| Acenaphthylene | <0.10 | 0.10 |
| Aniline | <0.20 | 0.20 |
| Anthracene | <0.10 | 0.10 |
| Azobenzene | <0.10 | 0.10 |
| Benzidine | <0.40 | 0.40 |
| Benzo(a)anthracene | <0.10 | 0.10 |
| benzo(a)pyrene | <0.10 | 0.10 |
| benzo(b)fluoranthene | <0.10 | 0.10 |
| benzo(g,h,i)perylene | <0.10 | 0.10 |
| Benzoic acid | <1.0 | 1.0 |
| Benzo(k)fluoranthene | <0.10 | 0.10 |
| Benzyl alcohol | <0.10 | 0.10 |
| 4-Bromophenyl phenyl ether | <0.10 | 0.10 |
| Butyl benzyl phthalate | <0.50 | 0.50 |
| 4-Chloro-3-methylphenol | <0.20 | 0.20 |
| 4-Chloroaniline | <0.40 | 0.40 |
| Bis(2-chloroethoxy)methane | <0.10 | 0.10 |
| Bis(2-chloroethyl)ether | <0.10 | 0.10 |
| Bis(2-chloroisopropyl)ether | <0.10 | 0.10 |
| 2-Chloronaphthalene | <0.10 | 0.10 |
| 2-Chlorophenol | <0.10 | 0.10 |
| 4-Chlorophenyl phenyl ether | <0.10 | 0.10 |
| Chrysene | <0.10 | 0.10 |
| Dibenzo(a,h)anthracene | <0.10 | 0.10 |
| Dibenzofuran | <0.10 | 0.10 |

Eydie Schwartz

Eydie Schwartz
Project Manager

LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney
Method: Semivolatile Organics by GC/MS

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06
Units: mg/kg

Date Sampled: 01/31/06
Date Prepared: 02/02/06
Date Analyzed: 02/06/06
AA ID No: 6B01003-05
Client ID No: Sample-6A
Matrix: Soil
Dilution Factor: 1

MRL

8270C (EPA 8270C) (continued)

| | | |
|---------------------------------|-------|------|
| Di-n-butyl phthalate | <2.0 | 2.0 |
| 1,2-Dichlorobenzene | <0.10 | 0.10 |
| 1,3-Dichlorobenzene | <0.10 | 0.10 |
| 1,4-Dichlorobenzene | <0.10 | 0.10 |
| 2,4-Dichlorophenol | <0.10 | 0.10 |
| Diethyl phthalate | <0.80 | 0.80 |
| 2,4-Dimethylphenol | <0.10 | 0.10 |
| methyl phthalate | <0.20 | 0.20 |
| β -Dinitro-2-methylphenol | <0.20 | 0.20 |
| α -Dinitrophenol | <0.40 | 0.40 |
| 2,6-Dinitrotoluene | <0.10 | 0.10 |
| 2,4-Dinitrotoluene | <0.10 | 0.10 |
| Di-n-octyl phthalate | <0.10 | 0.10 |
| 1,2-Diphenylhydrazine | <0.10 | 0.10 |
| Bis(2-ethylhexyl)phthalate | <0.20 | 0.20 |
| Fluoranthene | <0.10 | 0.10 |
| Fluorene | <0.10 | 0.10 |
| Hexachlorobenzene | <0.10 | 0.10 |
| Hexachlorobutadiene | <0.10 | 0.10 |
| Hexachlorocyclopentadiene | <0.10 | 0.10 |
| Hexachloroethane | <0.10 | 0.10 |
| Indeno (1,2,3-cd) pyrene | <0.40 | 0.40 |
| Isophorone | <0.10 | 0.10 |
| 2-Methylnaphthalene | <0.10 | 0.10 |
| 2-Methylphenol | <0.20 | 0.20 |
| 3-Methylphenol | <0.20 | 0.20 |
| 4-Methylphenol | <0.20 | 0.20 |

Edie Schwartz
Project Manager

LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney
Method: Semivolatile Organics by GC/MS

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06
Units: mg/kg

Date Sampled: 01/31/06
Date Prepared: 02/02/06
Date Analyzed: 02/06/06
AA ID No: 6B01003-05
Client ID No: Sample-6A
Matrix: Soil
Dilution Factor: 1

8270C (EPA 8270C) (continued)

| | MRL |
|---------------------------|-------|
| Naphthalene | <0.10 |
| 4-Nitroaniline | <0.50 |
| 3-Nitroaniline | <0.40 |
| 2-Nitroaniline | <0.10 |
| Nitrobenzene | <0.10 |
| 2-Nitrophenol | <0.20 |
| 4-Nitrophenol | <0.20 |
| Nitrosodimethylamine | <0.10 |
| N-Nitrosodiphenylamine | <0.10 |
| N-Nitrosodi-n-propylamine | <0.10 |
| Pentachlorophenol | <0.10 |
| Phenanthrene | <0.10 |
| Phenol | <0.10 |
| Pyrene | <0.10 |
| 1,2,4-Trichlorobenzene | <0.10 |
| 2,4,5-Trichlorophenol | <0.20 |
| 2,4,6-Trichlorophenol | <0.20 |

| <u>Surrogates</u> | <u>%REC Limits</u> |
|----------------------|--------------------|
| 2-Fluorobiphenyl | 43-116 |
| 2-Fluorophenol | 21-100 |
| Nitrobenzene-d5 | 35-134 |
| Phenol-d6 | 10-94 |
| Terphenyl-d14 | 33-141 |
| 2,4,6-Tribromophenol | 10-123 |

Eydie Schwartz
Project Manager



Letter AJ22. Signatory – City of Burbank –
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LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney
Method: Cations by Ion Chromatography

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06

| AA I.D. No. | Client I.D. No. | Sampled | Prepared | Analyzed | Dilution | Result | Units | MRL |
|---------------------------------------------------------------------|-----------------|----------|----------|----------|----------|--------|-------|------|
| <u>7199 Hexavalent Chromium by IC - Low Level (EPA 7199)</u> | | | | | | | | |
| 6B01003-01 | Sample-1A | 01/31/06 | 02/03/06 | 02/06/06 | 1 | 0.047 | mg/kg | 0.04 |
| 6B01003-02 | Sample-2A | 01/31/06 | 02/03/06 | 02/06/06 | 1 | 0.15 | mg/kg | 0.04 |
| 6B01003-03 | Sample-4A | 01/31/06 | 02/03/06 | 02/06/06 | 1 | 0.20 | mg/kg | 0.04 |
| 6B01003-04 | Sample-5A | 01/31/06 | 02/03/06 | 02/06/06 | 1 | <0.040 | mg/kg | 0.04 |
| 6B01003-05 | Sample-6A | 01/31/06 | 02/03/06 | 02/06/06 | 1 | <0.040 | mg/kg | 0.04 |

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LABORATORY ANALYSIS RESULTS

Project No: NA
 Project Name: Burbank / Disney
 Method: VOCs by GC/MS

AA Project No: A64201
 Date Received: 01/31/06
 Date Reported: 02/14/06
 Units: ug/kg

| Date Sampled: | 01/31/06 | 01/31/06 | 01/31/06 | 01/31/06 | |
|------------------|------------|------------|------------|------------|-----|
| Date Prepared: | 02/01/06 | 02/01/06 | 02/01/06 | 02/01/06 | |
| Date Analyzed: | 02/01/06 | 02/01/06 | 02/01/06 | 02/01/06 | |
| AA ID No: | 6B01003-01 | 6B01003-02 | 6B01003-03 | 6B01003-04 | |
| Client ID No: | Sample-1A | Sample-2A | Sample-4A | Sample-5A | |
| Matrix: | Soil | Soil | Soil | Soil | |
| Dilution Factor: | 1 | 1 | 1 | 1 | MRL |

8260B (EPA 8260B)

| | | | | | |
|-------------------------------|------|------|------|------|-----|
| Acetone | <50 | <50 | <50 | <50 | 50 |
| Benzene | <2.0 | <2.0 | <2.0 | <2.0 | 2.0 |
| Bromobenzene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Bromochloromethane | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Bromodichloromethane | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Bromoform | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Bromomethane | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| γ-Butanone (MEK) | <50 | <50 | <50 | <50 | 50 |
| α-Butylbenzene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| n-Butylbenzene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| tert-Butylbenzene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Carbon Disulfide | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Carbon Tetrachloride | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Chlorobenzene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Chloroethane | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Chloroform | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Chloromethane | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 4-Chlorotoluene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 2-Chlorotoluene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 1,2-Dibromo-3-chloropropane | <10 | <10 | <10 | <10 | 10 |
| Dibromochloromethane | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 1,2-Dibromoethane (EDB) | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Dibromomethane | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 1,3-Dichlorobenzene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 1,2-Dichlorobenzene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 1,4-Dichlorobenzene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Dichlorodifluoromethane (R12) | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |

Eydie Schwartz

Eydie Schwartz
 Project Manager

LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney
Method: VOCs by GC/MS

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06
Units: ug/kg

| Date Sampled: | 01/31/06 | 01/31/06 | 01/31/06 | 01/31/06 |
|------------------|------------|------------|------------|------------|
| Date Prepared: | 02/01/06 | 02/01/06 | 02/01/06 | 02/01/06 |
| Date Analyzed: | 02/01/06 | 02/01/06 | 02/01/06 | 02/01/06 |
| AA ID No: | 6B01003-01 | 6B01003-02 | 6B01003-03 | 6B01003-04 |
| Client ID No: | Sample-1A | Sample-2A | Sample-4A | Sample-5A |
| Matrix: | Soil | Soil | Soil | Soil |
| Dilution Factor: | 1 | 1 | 1 | MRL |

8260B (EPA 8260B) (continued)

| | | | | | |
|--------------------------------|------|------|------|------|-----|
| 1,1-Dichloroethane | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 1,2-Dichloroethane (EDC) | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 1,1-Dichloroethylene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| trans-1,2-Dichloroethylene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| cis-1,2-Dichloroethylene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 2,2-Dichloropropane | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 1,2-Dichloropropane | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| * 1,2-Dichloropropane | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Dichloropropylene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| trans-1,3-Dichloropropylene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| cis-1,3-Dichloropropylene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Ethylbenzene | <2.0 | <2.0 | <2.0 | <2.0 | 2.0 |
| Hexachlorobutadiene | <10 | <10 | <10 | <10 | 10 |
| 2-Hexanone (MBK) | <50 | <50 | <50 | <50 | 50 |
| Isopropylbenzene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 4-Isopropyltoluene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Methyl-tert-Butyl Ether (MTBE) | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Methylene Chloride | <50 | <50 | <50 | <50 | 50 |
| 4-Methyl-2-pentanone (MIBK) | <50 | <50 | <50 | <50 | 50 |
| Naphthalene | <10 | <10 | <10 | <10 | 10 |
| n-Propylbenzene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Styrene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 1,1,2,2-Tetrachloroethane | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 1,1,1,2-Tetrachloroethane | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Tetrachloroethylene (PCE) | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Toluene | <2.0 | <2.0 | <2.0 | <2.0 | 2.0 |
| 1,2,4-Trichlorobenzene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |

Ydzie Schwartz

Ydzie Schwartz
Project Manager

LABORATORY ANALYSIS RESULTS

Project No: NA
 Project Name: Burbank / Disney
 Method: VOCs by GC/MS

AA Project No: A64201
 Date Received: 01/31/06
 Date Reported: 02/14/06
 Units: ug/kg

| | | | | |
|------------------|------------|------------|------------|------------|
| Date Sampled: | 01/31/06 | 01/31/06 | 01/31/06 | 01/31/06 |
| Date Prepared: | 02/01/06 | 02/01/06 | 02/01/06 | 02/01/06 |
| Date Analyzed: | 02/01/06 | 02/01/06 | 02/01/06 | 02/01/06 |
| AA ID No: | 6B01003-01 | 6B01003-02 | 6B01003-03 | 6B01003-04 |
| Client ID No: | Sample-1A | Sample-2A | Sample-4A | Sample-5A |
| Matrix: | Soil | Soil | Soil | Soil |
| Dilution Factor: | 1 | 1 | 1 | MRL |

8260B (EPA 8260B) (continued)

| | | | | | |
|----------------------------------------------|------|------|------|------|-----|
| 1,2,3-Trichlorobenzene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 1,1,2-Trichloroethane | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 1,1,1-Trichloroethane | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Trichloroethylene (TCE) | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Trichlorofluoromethane (R11) | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 1,2,3-Trichloropropane | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 1,1,2-Trichloro-1,2,2-trifluoroethane (R113) | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| 4-Trimethylbenzene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| ,3,5-Trimethylbenzene | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Vinyl chloride | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| o-Xylene | <2.0 | <2.0 | <2.0 | <2.0 | 2.0 |
| m,p-Xylenes | <2.0 | <2.0 | <2.0 | <2.0 | 2.0 |

| | %REC Limits | | | |
|----------------------|-------------|-------|-------|-----------------|
| 4-Bromofluorobenzene | 84.0% | 86.0% | 86.0% | 84.0% 80-120 |
| Dibromofluoromethane | 84.0% | 86.0% | 84.0% | 84.0% 80-120 |
| Toluene-d8 | 102% | 104% | 106% | 104% 80-120 |

Eydie Schwartz

Eydie Schwartz
Project Manager

LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney
Method: VOCs by GC/MS

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06
Units: ug/kg

| | |
|------------------|------------|
| Date Sampled: | 01/31/06 |
| Date Prepared: | 02/01/06 |
| Date Analyzed: | 02/01/06 |
| AA ID No: | 6B01003-05 |
| Client ID No: | Sample-6A |
| Matrix: | Soil |
| Dilution Factor: | 1 |

MRL

8260B (EPA 8260B)

| | | |
|-------------------------------|------|-----|
| Acetone | <50 | 50 |
| Benzene | <2.0 | 2.0 |
| Bromobenzene | <5.0 | 5.0 |
| Bromochloromethane | <5.0 | 5.0 |
| Bromodichloromethane | <5.0 | 5.0 |
| Bromoform | <5.0 | 5.0 |
| Bromomethane | <5.0 | 5.0 |
| Tetanone (MEK) | <50 | 50 |
| α -Butylbenzene | <5.0 | 5.0 |
| β -Butylbenzene | <5.0 | 5.0 |
| tert-Butylbenzene | <5.0 | 5.0 |
| Carbon Disulfide | <5.0 | 5.0 |
| Carbon Tetrachloride | <5.0 | 5.0 |
| Chlorobenzene | <5.0 | 5.0 |
| Chloroethane | <5.0 | 5.0 |
| Chloroform | <5.0 | 5.0 |
| Chloromethane | <5.0 | 5.0 |
| 4-Chlorotoluene | <5.0 | 5.0 |
| 2-Chlorotoluene | <5.0 | 5.0 |
| 1,2-Dibromo-3-chloropropane | <10 | 10 |
| Dibromochloromethane | <5.0 | 5.0 |
| 1,2-Dibromoethane (EDB) | <5.0 | 5.0 |
| Dibromomethane | <5.0 | 5.0 |
| 1,3-Dichlorobenzene | <5.0 | 5.0 |
| 1,2-Dichlorobenzene | <5.0 | 5.0 |
| 1,4-Dichlorobenzene | <5.0 | 5.0 |
| Dichlorodifluoromethane (R12) | <5.0 | 5.0 |

Eydie Schwartz

Eydie Schwartz
Project Manager

LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney
Method: VOCs by GC/MS

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06
Units: ug/kg

| | | |
|------------------|------------|-----|
| Date Sampled: | 01/31/06 | MRL |
| Date Prepared: | 02/01/06 | |
| Date Analyzed: | 02/01/06 | |
| AA ID No: | 6B01003-05 | |
| Client ID No: | Sample-6A | |
| Matrix: | Soil | MRL |
| Dilution Factor: | 1 | |

8260B (EPA 8260B) (continued)

| | | |
|--------------------------------|------|-----|
| 1,1-Dichloroethane | <5.0 | 5.0 |
| 1,2-Dichloroethane (EDC) | <5.0 | 5.0 |
| 1,1-Dichlorethylene | <5.0 | 5.0 |
| trans-1,2-Dichloroethylene | <5.0 | 5.0 |
| cis-1,2-Dichloroethylene | <5.0 | 5.0 |
| 2,2-Dichloropropane | <5.0 | 5.0 |
| 1,2-Dichloropropane | <5.0 | 5.0 |
| -Dichloropropane | <5.0 | 5.0 |
| , -Dichloropropylene | <5.0 | 5.0 |
| cis-1,3-Dichloropropylene | <5.0 | 5.0 |
| trans-1,3-Dichloropropylene | <5.0 | 5.0 |
| Ethylbenzene | <2.0 | 2.0 |
| Hexachlorobutadiene | <10 | 10 |
| 2-Hexanone (MBK) | <50 | 50 |
| Isopropylbenzene | <5.0 | 5.0 |
| 4-Isopropyltoluene | <5.0 | 5.0 |
| Methyl-tert-Butyl Ether (MTBE) | <5.0 | 5.0 |
| Methylene Chloride | <50 | 50 |
| 4-Methyl-2-pentanone (MIBK) | <50 | 50 |
| Naphthalene | <10 | 10 |
| n-Propylbenzene | <5.0 | 5.0 |
| Styrene | <5.0 | 5.0 |
| 1,1,2,2-Tetrachloroethane | <5.0 | 5.0 |
| 1,1,1,2-Tetrachloroethane | <5.0 | 5.0 |
| Tetrachloroethylene (PCE) | <5.0 | 5.0 |
| Toluene | <2.0 | 2.0 |
| 1,2,4-Trichlorobenzene | <5.0 | 5.0 |

Eydie Schwartz
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Community Development Department

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LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney
Method: VOCs by GC/MS

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06
Units: ug/kg

Date Sampled: 01/31/06
Date Prepared: 02/01/06
Date Analyzed: 02/01/06
AA ID No: 6B01003-05
Client ID No: Sample-6A
Matrix: Soil
Dilution Factor: 1

MRL

8260B (EPA 8260B) (continued)

| | | |
|----------------------------------------------|------|-----|
| 1,2,3-Trichlorobenzene | <5.0 | 5.0 |
| 1,1,2-Trichloroethane | <5.0 | 5.0 |
| 1,1,1-Trichloroethane | <5.0 | 5.0 |
| Trichloroethylene (TCE) | <5.0 | 5.0 |
| Trichlorofluoromethane (R11) | <5.0 | 5.0 |
| 1,2,3-Trichloropropane | <5.0 | 5.0 |
| 1,1,2-Trichloro-1,2,2-trifluoroethane (R113) | <5.0 | 5.0 |
| ,4-Trimethylbenzene | <5.0 | 5.0 |
| 1,3,5-Trimethylbenzene | <5.0 | 5.0 |
| Vinyl chloride | <5.0 | 5.0 |
| o-Xylene | <2.0 | 2.0 |
| m,p-Xylenes | <2.0 | 2.0 |

Surrogates

| | | %REC Limits |
|----------------------|-------|-------------|
| 4-Bromofluorobenzene | 86.0% | 80-120 |
| Dibromofluoromethane | 84.0% | 80-120 |
| Toluene-d8 | 104% | 80-120 |

Cydie Schwartz
Project Manager

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LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney
Method: Total Metals CAM 17

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06
Units: mg/kg

| | | | | |
|------------------|------------|------------|------------|------------|
| Date Sampled: | 01/31/06 | 01/31/06 | 01/31/06 | 01/31/06 |
| Date Prepared: | 02/06/06 | 02/06/06 | 02/06/06 | 02/06/06 |
| Date Analyzed: | 02/06/06 | 02/06/06 | 02/06/06 | 02/06/06 |
| AA ID No: | 6B01003-01 | 6B01003-02 | 6B01003-03 | 6B01003-04 |
| Client ID No: | Sample-1A | Sample-2A | Sample-4A | Sample-5A |
| Matrix: | Soil | Soil | Soil | Soil |
| Dilution Factor: | 1 | 1 | 1 | 1 |
| | | | | MRL |

CAM Metals Less Hg 6000/7000 (EPA 6010B/7000)

| | | | | | |
|------------|-------|-------|-------|-------|------|
| Antimony | <10 | <10 | <10 | <10 | 10 |
| Arsenic | <0.50 | 1.6 | 2.9 | <0.50 | 0.50 |
| Barium | 57 | 190 | 79 | 51 | 10 |
| Beryllium | <1.0 | <1.0 | <1.0 | <1.0 | 1.0 |
| Cadmium | <1.0 | <1.0 | <1.0 | <1.0 | 1.0 |
| Chromium | 7.4 | 28 | 13 | 4.8 | 3.0 |
| Rhodium | 4.2 | 12 | 5.4 | 3.5 | 3.0 |
| Lead | 7.4 | 41 | 18 | 5.7 | 3.0 |
| Molybdenum | 4.1 | 18 | 69 | 3.5 | 3.0 |
| Nickel | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Selenium | 3.2 | 14 | 7.0 | <3.0 | 3.0 |
| Silver | <0.50 | <0.50 | <0.50 | <0.50 | 0.50 |
| Thallium | <1.0 | <1.0 | <1.0 | <1.0 | 1.0 |
| Vanadium | <5.0 | <5.0 | <5.0 | <5.0 | 5.0 |
| Zinc | 21 | 56 | 23 | 17 | 10 |
| | 27 | 72 | 92 | 24 | 3.0 |

Eydie Schwartz

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LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney
Method: Total Metals CAM 17

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06
Units: mg/kg

Date Sampled: 01/31/06
Date Prepared: 02/06/06
Date Analyzed: 02/06/06
AA ID No: 6B01003-05
Client ID No: Sample-6A
Matrix: Soil
Dilution Factor: 1

MRL

CAM Metals Less Hg 6000/7000 (EPA 6010B/7000)

| | | |
|------------|-------|------|
| Antimony | <10 | 10 |
| Arsenic | <0.50 | 0.50 |
| Barium | 130 | 10 |
| Beryllium | <1.0 | 1.0 |
| Cadmium | <1.0 | 1.0 |
| Chromium | 20 | 3.0 |
| Cobalt | 9.2 | 3.0 |
| Copper | 24 | 3.0 |
| Lead | 12 | 3.0 |
| Molybdenum | <5.0 | 5.0 |
| Nickel | 12 | 3.0 |
| Selenium | <0.50 | 0.50 |
| Silver | <1.0 | 1.0 |
| Thallium | <5.0 | 5.0 |
| Vanadium | 38 | 10 |
| Zinc | 62 | 3.0 |

Eydie Schwartz
Project Manager

LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney
Method: Total Metals CAM 17

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06
Units: mg/kg

| | | | | |
|------------------|------------|------------|------------|------------|
| Date Sampled: | 01/31/06 | 01/31/06 | 01/31/06 | 01/31/06 |
| Date Prepared: | 02/06/06 | 02/06/06 | 02/06/06 | 02/06/06 |
| Date Analyzed: | 02/06/06 | 02/06/06 | 02/06/06 | 02/06/06 |
| AA ID No: | 6B01003-01 | 6B01003-02 | 6B01003-03 | 6B01003-04 |
| Client ID No: | Sample-1A | Sample-2A | Sample-4A | Sample-5A |
| Matrix: | Soil | Soil | Soil | Soil |
| Dilution Factor: | 1 | 1 | 1 | MRL |

Mercury Total EPA 7470A/7471A (EPA 7471A)

| | | | | | |
|---------|-------|-------|-------|--------|-------|
| Mercury | 0.031 | 0.051 | 0.044 | <0.020 | 0.020 |
|---------|-------|-------|-------|--------|-------|

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LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney
Method: Total Metals CAM 17

Date Sampled: 01/31/06
Date Prepared: 02/06/06
Date Analyzed: 02/06/06
AA ID No: 6B01003-05
Client ID No: Sample-6A
Matrix: Soil
Dilution Factor: 1

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06
Units: mg/kg

MRL

Mercury Total EPA 7470A/7471A (EPA 7471A)

| | | |
|---------|-------|-------|
| Mercury | 0.068 | 0.020 |
|---------|-------|-------|

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LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06

| Analyte | Reporting Result | Reporting Limit | Units | Spike Level | Source %REC Result | %REC %REC Limits | RPD RPD Limit | Notes |
|---------------------------------------------------------|------------------|-----------------|-------|-------------|--------------------|---------------------------------------|---------------|-------|
| Semivolatile Organics by GC/MS - Quality Control | | | | | | | | |
| <i>Batch B6B0218 - EPA 3545 MS</i> | | | | | | | | |
| Blank (B6B0218-BLK1) | | | | | | Prepared: 02/02/06 Analyzed: 02/06/06 | | |
| 3,3'-Dichlorobenzidine | <0.40 | 0.40 | mg/kg | | | | | |
| Acenaphthene | <0.10 | 0.10 | mg/kg | | | | | |
| Acenaphthylene | <0.10 | 0.10 | mg/kg | | | | | |
| Aniline | <0.20 | 0.20 | mg/kg | | | | | |
| Anthracene | <0.10 | 0.10 | mg/kg | | | | | |
| Azobenzene | <0.10 | 0.10 | mg/kg | | | | | |
| Benzidine | <0.40 | 0.40 | mg/kg | | | | | |
| Benzo(a)anthracene | <0.10 | 0.10 | mg/kg | | | | | |
| Benzo(a)pyrene | <0.10 | 0.10 | mg/kg | | | | | |
| Benzo(b)fluoranthene | <0.10 | 0.10 | mg/kg | | | | | |
| Benzo(g,h,i)perylene | <0.10 | 0.10 | mg/kg | | | | | |
| Benzoic acid | <1.0 | 1.0 | mg/kg | | | | | |
| Benzo(k)fluoranthene | <0.10 | 0.10 | mg/kg | | | | | |
| Benzyl alcohol | <0.10 | 0.10 | mg/kg | | | | | |
| 4-Bromophenyl phenyl ether | <0.10 | 0.10 | mg/kg | | | | | |
| Butyl benzyl phthalate | <0.50 | 0.50 | mg/kg | | | | | |
| 4-Chloro-3-methylphenol | <0.20 | 0.20 | mg/kg | | | | | |
| 4-Chloroaniline | <0.40 | 0.40 | mg/kg | | | | | |
| Bis(2-chloroethoxy)methane | <0.10 | 0.10 | mg/kg | | | | | |
| Bis(2-chloroethyl)ether | <0.10 | 0.10 | mg/kg | | | | | |
| Bis(2-chloroisopropyl)ether | <0.10 | 0.10 | mg/kg | | | | | |
| 2-Chloronaphthalene | <0.10 | 0.10 | mg/kg | | | | | |
| 2-Chlorophenol | <0.10 | 0.10 | mg/kg | | | | | |
| 4-Chlorophenyl phenyl ether | <0.10 | 0.10 | mg/kg | | | | | |
| Chrysene | <0.10 | 0.10 | mg/kg | | | | | |
| Dibenz(a,h)anthracene | <0.10 | 0.10 | mg/kg | | | | | |
| Dibenzofuran | <0.10 | 0.10 | mg/kg | | | | | |
| Di-n-butyl phthalate | <2.0 | 2.0 | mg/kg | | | | | |
| 1,2-Dichlorobenzene | <0.10 | 0.10 | mg/kg | | | | | |

Eydie Schwartz

Eydie Schwartz
Project Manager

LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06

| Analyte | Reporting Result | Reporting Limit | Units | Spike Level | Source Result | %REC %REC | RPD Limits | RPD Limit | Notes |
|---------------------------------------------------------|------------------|-----------------|-------|-------------|---------------|-----------|------------|-----------|-------|
| Semivolatile Organics by GC/MS - Quality Control | | | | | | | | | |
| <i>Batch B6B0218 - EPA 3545 MS</i> | | | | | | | | | |
| Blank (B6B0218-BLK1) Continued | | | | | | | | | |
| Prepared: 02/02/06 Analyzed: 02/06/06 | | | | | | | | | |
| 1,3-Dichlorobenzene | <0.10 | 0.10 | mg/kg | | | | | | |
| 1,4-Dichlorobenzene | <0.10 | 0.10 | mg/kg | | | | | | |
| 2,4-Dichlorophenol | <0.10 | 0.10 | mg/kg | | | | | | |
| Diethyl phthalate | <0.80 | 0.80 | mg/kg | | | | | | |
| 2,4-Dimethylphenol | <0.10 | 0.10 | mg/kg | | | | | | |
| Dimethyl phthalate | <0.20 | 0.20 | mg/kg | | | | | | |
| 4,6-Dinitro-2-methylphenol | <0.20 | 0.20 | mg/kg | | | | | | |
| 2,4-Dinitrophenol | <0.40 | 0.40 | mg/kg | | | | | | |
| 2,6-Dinitrotoluene | <0.10 | 0.10 | mg/kg | | | | | | |
| 2,4-Dinitrotoluene | <0.10 | 0.10 | mg/kg | | | | | | |
| γ -n-octyl phthalate | <0.10 | 0.10 | mg/kg | | | | | | |
| ω -Diphenylhydrazine | <0.10 | 0.10 | mg/kg | | | | | | |
| Bis(2-ethylhexyl)phthalate | <0.20 | 0.20 | mg/kg | | | | | | |
| Fluoranthene | <0.10 | 0.10 | mg/kg | | | | | | |
| Fluorene | <0.10 | 0.10 | mg/kg | | | | | | |
| Hexachlorobenzene | <0.10 | 0.10 | mg/kg | | | | | | |
| Hexachlorobutadiene | <0.10 | 0.10 | mg/kg | | | | | | |
| Hexachlorocyclopentadiene | <0.10 | 0.10 | mg/kg | | | | | | |
| Hexachloroethane | <0.10 | 0.10 | mg/kg | | | | | | |
| Indeno (1,2,3-cd) pyrene | <0.40 | 0.40 | mg/kg | | | | | | |
| Isophorone | <0.10 | 0.10 | mg/kg | | | | | | |
| 2-Methylnaphthalene | <0.10 | 0.10 | mg/kg | | | | | | |
| 2-Methylphenol | <0.20 | 0.20 | mg/kg | | | | | | |
| 3-Methylphenol | <0.20 | 0.20 | mg/kg | | | | | | |
| 4-Methylphenol | <0.20 | 0.20 | mg/kg | | | | | | |
| Naphthalene | <0.10 | 0.10 | mg/kg | | | | | | |
| 4-Nitroaniline | <0.50 | 0.50 | mg/kg | | | | | | |
| 3-Nitroaniline | <0.40 | 0.40 | mg/kg | | | | | | |
| 2-Nitroaniline | <0.10 | 0.10 | mg/kg | | | | | | |

Eydie Schwartz

Eydie Schwartz
Project Manager

**LABORATORY ANALYSIS RESULTS**

Project No: NA
Project Name: Burbank / Disney

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06

| Analyst | Reporting Result | Limit | Units | Spike Level | Source | %REC Result | %REC | RPD Limits | RPD | Notes |
|----------------------------------------------------------|------------------|-------|-------|-------------|--------|-------------|--------|------------|-----|-------|
| Semivolatile Organics by GC/MS - Quality Control | | | | | | | | | | |
| <i>Batch B6B0218 - EPA 3545 MS</i> | | | | | | | | | | |
| Blank (B6B0218-BLK1) Continued | | | | | | | | | | |
| Prepared: 02/02/06 Analyzed: 02/06/06 | | | | | | | | | | |
| Nitrobenzene | <0.10 | 0.10 | mg/kg | | | | | | | |
| 2-Nitrophenol | <0.20 | 0.20 | mg/kg | | | | | | | |
| 4-Nitrophenol | <0.20 | 0.20 | mg/kg | | | | | | | |
| N-Nitrosodimethylamine | <0.10 | 0.10 | mg/kg | | | | | | | |
| N-Nitrosodiphenylamine | <0.10 | 0.10 | mg/kg | | | | | | | |
| N-Nitrosodi-n-propylamine | <0.10 | 0.10 | mg/kg | | | | | | | |
| Pentachlorophenol | <0.10 | 0.10 | mg/kg | | | | | | | |
| Phenanthrene | <0.10 | 0.10 | mg/kg | | | | | | | |
| Phenol | <0.10 | 0.10 | mg/kg | | | | | | | |
| Pyrene | <0.10 | 0.10 | mg/kg | | | | | | | |
| 1,2,4-Trichlorobenzene | <0.10 | 0.10 | mg/kg | | | | | | | |
| 1,5-Trichlorophenol | <0.20 | 0.20 | mg/kg | | | | | | | |
| ,4,6-Trichlorophenol | <0.20 | 0.20 | mg/kg | | | | | | | |
| Surrogate: 2-Fluorobiphenyl | 0.605 | | mg/kg | 1.00 | | 60.5 | 43-116 | | | |
| Surrogate: 2-Fluorophenol | 0.746 | | mg/kg | 2.00 | | 37.3 | 21-100 | | | |
| Surrogate: Nitrobenzene-d5 | 0.573 | | mg/kg | 1.00 | | 57.3 | 35-134 | | | |
| Surrogate: Phenol-d6 | 0.954 | | mg/kg | 2.00 | | 47.7 | 10-94 | | | |
| Surrogate: Terphenyl-d14 | 0.800 | | mg/kg | 1.00 | | 80.0 | 33-141 | | | |
| Surrogate: 2,4,6-Tribromophenol | 0.664 | | mg/kg | 2.00 | | 33.2 | 10-123 | | | |
| Matrix Spike (B6B0218-MS1) | | | | | | | | | | |
| Source: 6B01003-01 Prepared: 02/02/06 Analyzed: 02/06/06 | | | | | | | | | | |
| Acenaphthene | 0.565 | 0.10 | mg/kg | 1.00 | <0.10 | 56.5 | 47-145 | | | |
| Anthracene | 0.653 | 0.10 | mg/kg | 1.00 | <0.10 | 65.3 | 27-133 | | | |
| Benzo(a)pyrene | 0.560 | 0.10 | mg/kg | 1.00 | <0.10 | 56.0 | 17-163 | | | |
| Benzo(b)fluoranthene | 0.579 | 0.10 | mg/kg | 1.00 | <0.10 | 57.9 | 24-159 | | | |
| Butyl benzyl phthalate | 0.591 | 0.50 | mg/kg | 1.00 | <0.50 | 59.1 | 2-152 | | | |
| 4-Chloro-3-methylphenol | 0.956 | 0.20 | mg/kg | 1.00 | <0.20 | 95.6 | 22-147 | | | |
| Bis(2-chloroethyl)ether | 0.574 | 0.10 | mg/kg | 1.00 | <0.10 | 57.4 | 12-158 | | | |
| 2-Chloronaphthalene | 0.693 | 0.10 | mg/kg | 1.00 | <0.10 | 69.3 | 60-118 | | | |
| 4-Chlorophenyl phenyl ether | 0.623 | 0.10 | mg/kg | 1.00 | <0.10 | 62.3 | 25-158 | | | |
| 1,4-Dichlorobenzene | 0.545 | 0.10 | mg/kg | 1.00 | <0.10 | 54.5 | 20-124 | | | |

Eydie Schwartz

Eydie Schwartz
Project Manager

LABORATORY ANALYSIS RESULTS

Project No: NA
 Project Name: Burbank / Disney

AA Project No: A64201
 Date Received: 01/31/06
 Date Reported: 02/14/06

| Analyte | Reporting Result | Limit | Units | Spike Level | Source Result | %REC %REC | RPD Limits | RPD Limit | Notes |
|------------------------------------------------------------------------------------------------------|------------------|-------|-------|-------------|---------------|-----------|------------|-----------|-------|
| Semivolatile Organics by GC/MS - Quality Control | | | | | | | | | |
| <i>Batch B6B0218 - EPA 3545 MS</i> | | | | | | | | | |
| Matrix Spike (B6B0218-MS1) Continued Source: 6B01003-01 Prepared: 02/02/06 Analyzed: 02/06/06 | | | | | | | | | |
| 2,4-Dichlorophenol | 0.542 | 0.10 | mg/kg | 1.00 | <0.10 | 54.2 | 39-135 | | |
| Di-n-octyl phthalate | 0.352 | 0.10 | mg/kg | 1.00 | <0.10 | 35.2 | 4-146 | | |
| Fluoranthene | 0.434 | 0.10 | mg/kg | 1.00 | <0.10 | 43.4 | 26-137 | | |
| Fluorene | 0.613 | 0.10 | mg/kg | 1.00 | <0.10 | 61.3 | 59-121 | | |
| Hexachlorobenzene | 0.612 | 0.10 | mg/kg | 1.00 | <0.10 | 61.2 | 2-152 | | |
| Hexachlorobutadiene | 0.561 | 0.10 | mg/kg | 1.00 | <0.10 | 56.1 | 24-116 | | |
| Hexachloroethane | 0.503 | 0.10 | mg/kg | 1.00 | <0.10 | 50.3 | 40-113 | | |
| Isophorone | 0.455 | 0.10 | mg/kg | 1.00 | <0.10 | 45.5 | 21-196 | | |
| Naphthalene | 0.562 | 0.10 | mg/kg | 1.00 | <0.10 | 56.2 | 21-133 | | |
| Nitrobenzene | 0.566 | 0.10 | mg/kg | 1.00 | <0.10 | 56.6 | 35-180 | | |
| 2-Nitrophenol | 0.426 | 0.20 | mg/kg | 1.00 | <0.20 | 42.6 | 2-163 | | |
| N-Nitrosodi-n-propylamine | 0.616 | 0.10 | mg/kg | 1.00 | <0.10 | 61.6 | 2-230 | | |
| o-chlorophenol | 0.549 | 0.10 | mg/kg | 1.00 | <0.10 | 54.9 | 14-176 | | |
| phenol | 0.565 | 0.10 | mg/kg | 1.00 | <0.10 | 56.5 | 5-112 | | |
| Pyrene | 0.843 | 0.10 | mg/kg | 1.00 | <0.10 | 84.3 | 52-115 | | |
| 1,2,4-Trichlorobenzene | 0.529 | 0.10 | mg/kg | 1.00 | <0.10 | 52.9 | 44-142 | | |
| 2,4,6-Trichlorophenol | 0.770 | 0.20 | mg/kg | 1.00 | <0.20 | 77.0 | 37-144 | | |
| Surrogate: 2-Fluorobiphenyl | 0.632 | | mg/kg | 1.00 | | 63.2 | 43-116 | | |
| Surrogate: 2-Fluorophenol | 0.899 | | mg/kg | 2.00 | | 45.0 | 21-100 | | |
| Surrogate: Nitrobenzene-d5 | 0.574 | | mg/kg | 1.00 | | 57.4 | 35-134 | | |
| Surrogate: Phenol-d6 | 1.00 | | mg/kg | 2.00 | | 50.0 | 10-94 | | |
| Surrogate: Terphenyl-d4 | 0.906 | | mg/kg | 1.00 | | 90.6 | 33-141 | | |
| Surrogate: 2,4,6-Tribromophenol | 1.39 | | mg/kg | 2.00 | | 69.5 | 10-123 | | |
| Matrix Spike Dup (B6B0218-MSD1) Source: 6B01003-01 Prepared: 02/02/06 Analyzed: 02/06/06 | | | | | | | | | |
| Acenaphthene | 0.514 | 0.10 | mg/kg | 1.00 | <0.10 | 51.4 | 47-145 | 9.45 | 40 |
| Anthracene | 0.596 | 0.10 | mg/kg | 1.00 | <0.10 | 59.6 | 27-133 | 9.13 | 40 |
| Benzo(a)pyrene | 0.526 | 0.10 | mg/kg | 1.00 | <0.10 | 52.6 | 17-163 | 6.26 | 40 |
| Benzo(b)fluoranthene | 0.493 | 0.10 | mg/kg | 1.00 | <0.10 | 49.3 | 24-159 | 16.0 | 40 |
| Butyl benzyl phthalate | 0.512 | 0.50 | mg/kg | 1.00 | <0.50 | 51.2 | 2-152 | 14.3 | 40 |
| 4-Chloro-3-methylphenol | 0.926 | 0.20 | mg/kg | 1.00 | <0.20 | 92.6 | 22-147 | 3.19 | 40 |
| Bis(2-chloroethyl)ether | 0.534 | 0.10 | mg/kg | 1.00 | <0.10 | 53.4 | 12-158 | 7.22 | 40 |

Sydie Schwartz

Sydie Schwartz
 Project Manager

LABORATORY ANALYSIS RESULTS

Project No: NA
 Project Name: Burbank Disney

AA Project No: A64201
 Date Received: 01/31/06
 Date Reported: 02/14/06

| Analyte | Reporting Result | Limit | Units | Spike Level | Source Result | %REC %REC | RPD Limits | RPD Limit | Notes |
|---------|------------------|-------|-------|-------------|---------------|-----------|------------|-----------|-------|
|---------|------------------|-------|-------|-------------|---------------|-----------|------------|-----------|-------|

Semivolatile Organics by GC/MS - Quality Control

Batch B6B0218 - EPA 3545 MS

Matrix Spike Dup (B6B0218-MSD1) Source: 6B01003-01 Prepared: 02/02/06 Analyzed: 02/06/06

Continued

| | | | | | | | | | |
|---------------------------------|-------|------|-------|------|-------|------|--------|-------|----------|
| 2-Chloronaphthalene | 0.623 | 0.10 | mg/kg | 1.00 | <0.10 | 62.3 | 60-118 | 10.6 | 40 |
| 4-Chlorophenyl phenyl ether | 0.565 | 0.10 | mg/kg | 1.00 | <0.10 | 56.5 | 25-158 | 9.76 | 40 |
| 1,4-Dichlorobenzene | 0.500 | 0.10 | mg/kg | 1.00 | <0.10 | 50.0 | 20-124 | 8.61 | 40 |
| 2,4-Dichlorophenol | 0.508 | 0.10 | mg/kg | 1.00 | <0.10 | 50.8 | 39-135 | 6.48 | 40 |
| Di-n-octyl phthalate | 0.351 | 0.10 | mg/kg | 1.00 | <0.10 | 35.1 | 4-146 | 0.284 | 40 |
| Fluoranthene | 0.401 | 0.10 | mg/kg | 1.00 | <0.10 | 40.1 | 26-137 | 7.90 | 40 |
| Fluorene | 0.565 | 0.10 | mg/kg | 1.00 | <0.10 | 56.5 | 59-121 | 8.15 | 40 QM-07 |
| Hexachlorobenzene | 0.581 | 0.10 | mg/kg | 1.00 | <0.10 | 58.1 | 2-152 | 5.20 | 40 |
| Hexachlorobutadiene | 0.520 | 0.10 | mg/kg | 1.00 | <0.10 | 52.0 | 24-116 | 7.59 | 40 |
| Hexachloroethane | 0.473 | 0.10 | mg/kg | 1.00 | <0.10 | 47.3 | 40-113 | 6.15 | 40 |
| I-sophorone | 0.422 | 0.10 | mg/kg | 1.00 | <0.10 | 42.2 | 21-196 | 7.53 | 40 |
| phthalene | 0.508 | 0.10 | mg/kg | 1.00 | <0.10 | 50.8 | 21-133 | 10.1 | 40 |
| Nitrobenzene | 0.532 | 0.10 | mg/kg | 1.00 | <0.10 | 53.2 | 35-180 | 6.19 | 40 |
| 2-Nitrophenol | 0.411 | 0.20 | mg/kg | 1.00 | <0.20 | 41.1 | 2-163 | 3.58 | 40 |
| N-Nitrosodi-n-propylamine | 0.572 | 0.10 | mg/kg | 1.00 | <0.10 | 57.2 | 2-230 | 7.41 | 40 |
| Pentachlorophenol | 0.551 | 0.10 | mg/kg | 1.00 | <0.10 | 55.1 | 14-176 | 0.364 | 40 |
| Phenol | 0.533 | 0.10 | mg/kg | 1.00 | <0.10 | 53.3 | 5-112 | 5.83 | 40 |
| Pyrene | 0.673 | 0.10 | mg/kg | 1.00 | <0.10 | 67.3 | 52-115 | 22.4 | 40 |
| 1,2,4-Trichlorobenzene | 0.494 | 0.10 | mg/kg | 1.00 | <0.10 | 49.4 | 44-142 | 6.84 | 40 |
| 2,4,6-Trichlorophenol | 0.721 | 0.20 | mg/kg | 1.00 | <0.20 | 72.1 | 37-144 | 6.57 | 40 |
| Surrogate: 2-Fluorobiphenyl | 0.580 | | mg/kg | 1.00 | | 58.0 | 43-116 | | |
| Surrogate: 2-Fluorophenol | 0.845 | | mg/kg | 2.00 | | 42.2 | 21-100 | | |
| Surrogate: Nitrobenzene-d5 | 0.540 | | mg/kg | 1.00 | | 54.0 | 35-134 | | |
| Surrogate: Phenol-d6 | 0.935 | | mg/kg | 2.00 | | 46.8 | 10-94 | | |
| Surrogate: Terphenyl-d14 | 0.734 | | mg/kg | 1.00 | | 73.4 | 33-141 | | |
| Surrogate: 2,4,6-Tribromophenol | 1.30 | | mg/kg | 2.00 | | 65.0 | 10-123 | | |

Cations by Ion Chromatography - Quality Control

Batch B6B0302 - EPA 3060A

Blank (B6B0302-BLK1) Prepared: 02/03/06 Analyzed: 02/06/06

Chromium (VI) <0.040 0.040 mg/kg

Eydie Schwartz

Eydie Schwartz
Project Manager

American Analytics 0 9765 Eton Avenue, Chatsworth, California 91311
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Project No: NA
Project Name: Burbank / Disney

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06

| Analyte | Reporting Result | Limit | Units | Spike Level | Source | %REC %REC | RPD Limits | RPD Limit | Notes |
|---------|------------------|-------|-------|-------------|--------|-----------|------------|-----------|-------|
|---------|------------------|-------|-------|-------------|--------|-----------|------------|-----------|-------|

Cations by Ion Chromatography - Quality Control

Batch B6B0302 - EPA 3060A

| Prepared: 02/03/06 Analyzed: 02/06/06 | | | | | | | | | |
|----------------------------------------------------------------|--|--|--|--|--|--|--|--|--|
| LCS (B6B0302-BS1) | | | | | | | | | |
| Chromium (VI) 0.191 0.040 mg/kg 0.200 95.5 80-120 | | | | | | | | | |
| LCS Dup (B6B0302-BSD1) | | | | | | | | | |
| Chromium (VI) 0.187 0.040 mg/kg 0.200 93.5 80-120 2.12 20 | | | | | | | | | |
| Duplicate (B6B0302-DUP1) | | | | | | | | | |
| Chromium (VI) 0.0476 0.040 mg/kg 0.047 1.27 200 | | | | | | | | | |
| Matrix Spike (B6B0302-MS1) | | | | | | | | | |
| Chromium (VI) 0.313 0.040 mg/kg 0.200 0.15 81.5 70-130 | | | | | | | | | |
| Matrix Spike Dup (B6B0302-MSD1) | | | | | | | | | |
| Chromium (VI) 0.322 0.040 mg/kg 0.200 0.15 86.0 70-130 2.83 40 | | | | | | | | | |

VOCs by GC/MS - Quality Control

Batch B6B0204 - EPA 5030B

| Prepared & Analyzed: 02/01/06 | | | |
|-------------------------------|------|-----|-------|
| Blank (B6B0204-BLK1) | <50 | 50 | ug/kg |
| Acetone | <2.0 | 2.0 | ug/kg |
| Benzene | <5.0 | 5.0 | ug/kg |
| Bromobenzene | <5.0 | 5.0 | ug/kg |
| Bromochloromethane | <5.0 | 5.0 | ug/kg |
| Bromodichloromethane | <5.0 | 5.0 | ug/kg |
| Bromoform | <5.0 | 5.0 | ug/kg |
| Bromomethane | <5.0 | 5.0 | ug/kg |
| 2-Butanone (MEK) | <50 | 50 | ug/kg |
| sec-Butylbenzene | <5.0 | 5.0 | ug/kg |
| n-Butylbenzene | <5.0 | 5.0 | ug/kg |
| tert-Butylbenzene | <5.0 | 5.0 | ug/kg |
| Carbon Disulfide | <5.0 | 5.0 | ug/kg |
| Carbon Tetrachloride | <5.0 | 5.0 | ug/kg |
| Chlorobenzene | <5.0 | 5.0 | ug/kg |
| Chloroethane | <5.0 | 5.0 | ug/kg |
| Chloroform | <5.0 | 5.0 | ug/kg |
| Chloromethane | <5.0 | 5.0 | ug/kg |

Edie Schwartz
Project Manager



Project No: NA
Project Name: Burbank / Disney

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06

| Analyte | Reporting Result | Limit | Units | Spike Level | Source Result | %REC %REC | RPD Limits | RPD Limit | Notes |
|----------------------------------------|------------------|-------|-------|-------------|---------------|-----------|------------|-----------|-------|
| VOCs by GC/MS - Quality Control | | | | | | | | | |
| <i>Batch B6B0204 - EPA 5030B</i> | | | | | | | | | |
| Blank (B6B0204-BLK1) Continued | | | | | | | | | |
| Prepared & Analyzed: 02/01/06 | | | | | | | | | |
| 4-Chlorotoluene | <5.0 | 5.0 | ug/kg | | | | | | |
| 2-Chlorotoluene | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,2-Dibromo-3-chloropropane | <10 | 10 | ug/kg | | | | | | |
| Dibromochloromethane | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,2-Dibromoethane (EDB) | <5.0 | 5.0 | ug/kg | | | | | | |
| Dibromomethane | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,3-Dichlorobenzene | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,2-Dichlorobenzene | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,4-Dichlorobenzene | <5.0 | 5.0 | ug/kg | | | | | | |
| Dichlorodifluoromethane (R12) | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,1-Dichloroethane | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,1-Dichloroethane (EDC) | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,1-Dichloroethylene | <5.0 | 5.0 | ug/kg | | | | | | |
| trans-1,2-Dichloroethylene | <5.0 | 5.0 | ug/kg | | | | | | |
| cis-1,2-Dichloroethylene | <5.0 | 5.0 | ug/kg | | | | | | |
| 2,2-Dichloropropane | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,2-Dichloropropane | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,3-Dichloropropane | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,1-Dichloropropylene | <5.0 | 5.0 | ug/kg | | | | | | |
| cis-1,3-Dichloropropylene | <5.0 | 5.0 | ug/kg | | | | | | |
| trans-1,3-Dichloropropylene | <5.0 | 5.0 | ug/kg | | | | | | |
| Ethylbenzene | <2.0 | 2.0 | ug/kg | | | | | | |
| Hexachlorobutadiene | <10 | 10 | ug/kg | | | | | | |
| 2-Hexanone (MBK) | <50 | 50 | ug/kg | | | | | | |
| Isopropylbenzene | <5.0 | 5.0 | ug/kg | | | | | | |
| 4-Isopropyltoluene | <5.0 | 5.0 | ug/kg | | | | | | |
| Methyl-tert-Butyl Ether (MTBE) | <5.0 | 5.0 | ug/kg | | | | | | |
| Methylene Chloride | <50 | 50 | ug/kg | | | | | | |
| 4-Methyl-2-pentanone (MIBK) | <50 | 50 | ug/kg | | | | | | |

Eydie Schwartz

Eydie Schwartz
Project Manager

LABORATORY ANALYSIS RESULTS

Project No: NA
 Project Name: Burbank / Disney

AA Project No: A64201
 Date Received: 01/31/06
 Date Reported: 02/14/06

| Analyte | Reporting Result | Limit | Units | Spike Level | Source Result | %REC %REC | RPD Limits | RPD Limit | Notes |
|----------------------------------------------|------------------|-------|-------|-------------|---------------|-----------|------------|-----------|-------|
| VOCs by GC/MS - Quality Control | | | | | | | | | |
| Batch B6B0204 - EPA 5030B | | | | | | | | | |
| Blank (B6B0204-BLK1) Continued | | | | | | | | | |
| Prepared & Analyzed: 02/01/06 | | | | | | | | | |
| Naphthalene | <10 | 10 | ug/kg | | | | | | |
| n-Propylbenzene | <5.0 | 5.0 | ug/kg | | | | | | |
| Styrene | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,1,2,2-Tetrachloroethane | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,1,1,2-Tetrachloroethane | <5.0 | 5.0 | ug/kg | | | | | | |
| Tetrachloroethylene (PCE) | <5.0 | 5.0 | ug/kg | | | | | | |
| Toluene | <2.0 | 2.0 | ug/kg | | | | | | |
| 1,2,4-Trichlorobenzene | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,2,3-Trichlorobenzene | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,1,2-Trichloroethane | <5.0 | 5.0 | ug/kg | | | | | | |
| * 1,1-Trichloroethane | <5.0 | 5.0 | ug/kg | | | | | | |
| chloroethylene (TCE) | <5.0 | 5.0 | ug/kg | | | | | | |
| Trichlorofluoromethane (R11) | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,2,3-Trichloropropane | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,1,2-Trichloro-1,2,2-trifluoroethane (R113) | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,2,4-Trimethylbenzene | <5.0 | 5.0 | ug/kg | | | | | | |
| 1,3,5-Trimethylbenzene | <5.0 | 5.0 | ug/kg | | | | | | |
| Vinyl chloride | <5.0 | 5.0 | ug/kg | | | | | | |
| o-Xylene | <2.0 | 2.0 | ug/kg | | | | | | |
| m,p-Xylenes | <2.0 | 2.0 | ug/kg | | | | | | |
| Surrogate: 4-Bromofluorobenzene | 91.0 | | ug/kg | 100 | 91.0 | 80-120 | | | |
| Surrogate: Dibromofluoromethane | 85.2 | | ug/kg | 100 | 85.2 | 80-120 | | | |
| Surrogate: Toluene-d8 | 106 | | ug/kg | 100 | 106 | 80-120 | | | |
| Prepared & Analyzed: 02/01/06 | | | | | | | | | |
| LCS (B6B0204-BS1) | | | | | | | | | |
| Benzene | 45.0 | 2.0 | ug/kg | 40.0 | 112 | 75-125 | | | |
| Bromodichloromethane | 41.6 | 5.0 | ug/kg | 40.0 | 104 | 75-125 | | | |
| Bromoform | 36.6 | 5.0 | ug/kg | 40.0 | 91.5 | 75-125 | | | |
| Carbon Tetrachloride | 35.2 | 5.0 | ug/kg | 40.0 | 88.0 | 75-125 | | | |

Eydie Schwartz

Eydie Schwartz
Project Manager

LABORATORY ANALYSIS RESULTS

a Note:
 Project No: NA
 Project Name: Burbank / Disney

AA Project No: A64201
 Date Received: 01/31/06
 Date Reported: 02/14/06

| Analyte | Reporting Result | Reporting Limit | Units | Spike Level | Source Result | %REC %REC | RPD Limits | RPD Limit | Notes |
|--------------------------------------------------|------------------|-----------------|-------|-------------|---------------|-----------|------------|-----------|-------|
| VOCs by GC/MS - Quality Control | | | | | | | | | |
| <i>Batch B6B0204 - EPA 5030B</i> | | | | | | | | | |
| LCS (B6B0204-BS1) Continued | | | | | | | | | |
| Prepared & Analyzed: 02/01/06 | | | | | | | | | |
| Chlorobenzene | 38.2 | 5.0 | ug/kg | 40.0 | 95.5 | 75-125 | | | |
| Chloroethane | 43.2 | 5.0 | ug/kg | 40.0 | 108 | 75-125 | | | |
| Chloroform | 41.8 | 5.0 | ug/kg | 40.0 | 104 | 75-125 | | | |
| Chloromethane | 41.0 | 5.0 | ug/kg | 40.0 | 102 | 75-125 | | | |
| Dibromochloromethane | 42.0 | 5.0 | ug/kg | 40.0 | 105 | 75-125 | | | |
| 1,4-Dichlorobenzene | 43.6 | 5.0 | ug/kg | 40.0 | 109 | 75-125 | | | |
| 1,1-Dichloroethane | 45.2 | 5.0 | ug/kg | 40.0 | 113 | 75-125 | | | |
| 1,2-Dichloroethane (EDC) | 44.2 | 5.0 | ug/kg | 40.0 | 110 | 75-125 | | | |
| 1,1-Dichloroethylene | 37.2 | 5.0 | ug/kg | 40.0 | 93.0 | 75-125 | | | |
| trans-1,2-Dichloroethylene | 40.4 | 5.0 | ug/kg | 40.0 | 101 | 75-125 | | | |
| cis-1,2-Dichloroethylene | 44.4 | 5.0 | ug/kg | 40.0 | 111 | 75-125 | | | |
| * 2-Dichloropropane | 46.8 | 5.0 | ug/kg | 40.0 | 117 | 75-125 | | | |
| -1,3-Dichloropropylene | 44.8 | 5.0 | ug/kg | 40.0 | 112 | 75-125 | | | |
| Methylbenzene | 40.0 | 2.0 | ug/kg | 40.0 | 100 | 75-125 | | | |
| Methyl-tert-Butyl Ether (MTBE) | 46.0 | 5.0 | ug/kg | 40.0 | 115 | 75-125 | | | |
| Methylene Chloride | 59.4 | 50 | ug/kg | 40.0 | 148 | 75-125 | SP1 | | |
| n-Propylbenzene | 36.4 | 5.0 | ug/kg | 40.0 | 91.0 | 75-125 | | | |
| 1,1,2,2-Tetrachloroethane | 49.0 | 5.0 | ug/kg | 40.0 | 122 | 75-125 | | | |
| Tetrachloroethylene (PCE) | 42.2 | 5.0 | ug/kg | 40.0 | 106 | 75-125 | | | |
| Toluene | 39.8 | 2.0 | ug/kg | 40.0 | 99.5 | 75-125 | | | |
| 1,1,2-Trichloroethane | 46.6 | 5.0 | ug/kg | 40.0 | 116 | 75-125 | | | |
| 1,1,1-Trichloroethane | 36.0 | 5.0 | ug/kg | 40.0 | 90.0 | 75-125 | | | |
| Trichloroethylene (TCE) | 43.0 | 5.0 | ug/kg | 40.0 | 108 | 75-125 | | | |
| Vinyl chloride | 38.6 | 5.0 | ug/kg | 40.0 | 96.5 | 75-125 | | | |
| o-Xylene | 39.8 | 2.0 | ug/kg | 40.0 | 99.5 | 75-125 | | | |
| Surrogate: 4-Bromofluorobenzene | 92.6 | | ug/kg | 100 | 92.6 | 80-120 | | | |
| Surrogate: Dibromofluoromethane | 98.2 | | ug/kg | 100 | 98.2 | 80-120 | | | |
| Surrogate: Toluene-d8 | 97.6 | | ug/kg | 100 | 97.6 | 80-120 | | | |
| Matrix Spike (B6B0204-MS1) | | | | | | | | | |
| Source: 6B01003-01 Prepared & Analyzed: 02/01/06 | | | | | | | | | |
| Benzene | 39.6 | 2.0 | ug/kg | 40.0 | <2.0 | 99.0 | 70-130 | | |
| Bromoform | 34.8 | 5.0 | ug/kg | 40.0 | <5.0 | 87.0 | 70-130 | | |

Eydie Schwartz

Eydie Schwartz
Project Manager

LABORATORY ANALYSIS RESULTS

Project No: NA
 Project Name: Burbank / Disney

AA Project No: A64201
 Date Received: 01/31/06
 Date Reported: 02/14/06

| Analyte | Reporting Result | Limit | Units | Spike Level | Source Result | %REC %REC | RPD Limits | RPD Limit | Notes |
|---------|------------------|-------|-------|-------------|---------------|-----------|------------|-----------|-------|
|---------|------------------|-------|-------|-------------|---------------|-----------|------------|-----------|-------|

VOCs by GC/MS - Quality Control

Batch B6B0204 - EPA 5030B

Matrix Spike (B6B0204-MS1) Continued Source: 6B01003-01 Prepared & Analyzed: 02/01/06

| | | | | | | | | | |
|--------------------------------|------|-----|-------|------|------|------|--------|--|--|
| Chlorobenzene | 40.8 | 5.0 | ug/kg | 40.0 | <5.0 | 102 | 70-130 | | |
| Chloroform | 35.4 | 5.0 | ug/kg | 40.0 | <5.0 | 88.5 | 70-130 | | |
| 1,1-Dichloroethane | 38.8 | 5.0 | ug/kg | 40.0 | <5.0 | 97.0 | 70-130 | | |
| 1,1-Dichloroethylene | 35.8 | 5.0 | ug/kg | 40.0 | <5.0 | 89.5 | 70-130 | | |
| cis-1,2-Dichloroethylene | 37.4 | 5.0 | ug/kg | 40.0 | <5.0 | 93.5 | 70-130 | | |
| 1,2-Dichloropropane | 39.4 | 5.0 | ug/kg | 40.0 | <5.0 | 98.5 | 70-130 | | |
| Ethylbenzene | 43.6 | 2.0 | ug/kg | 40.0 | <2.0 | 109 | 70-130 | | |
| Methyl-tert-Butyl Ether (MTBE) | 32.8 | 5.0 | ug/kg | 40.0 | <5.0 | 82.0 | 70-130 | | |
| n-Propylbenzene | 39.6 | 5.0 | ug/kg | 40.0 | <5.0 | 99.0 | 70-130 | | |
| Tetrachloroethylene (PCE) | 42.8 | 5.0 | ug/kg | 40.0 | <5.0 | 107 | 70-130 | | |
| Toluene | 42.6 | 2.0 | ug/kg | 40.0 | <2.0 | 106 | 70-130 | | |
| 1,1-Trichloroethane | 32.8 | 5.0 | ug/kg | 40.0 | <5.0 | 82.0 | 70-130 | | |
| 1,1,1-Trichloroethylene (TCE) | 38.8 | 5.0 | ug/kg | 40.0 | <5.0 | 97.0 | 70-130 | | |
| 1,3,5-Trimethylbenzene | 37.6 | 5.0 | ug/kg | 40.0 | <5.0 | 94.0 | 70-130 | | |
| Vinyl chloride | 37.4 | 5.0 | ug/kg | 40.0 | <5.0 | 93.5 | 70-130 | | |

| | | | | | | | | | |
|---------------------------------|------|--|-------|-----|--|------|--------|--|--|
| Surrogate: 4-Bromofluorobenzene | 92.0 | | ug/kg | 100 | | 92.0 | 80-120 | | |
| Surrogate: Dibromofluoromethane | 80.2 | | ug/kg | 100 | | 80.2 | 80-120 | | |
| Surrogate: Toluene-d8 | 103 | | ug/kg | 100 | | 103 | 80-120 | | |

Matrix Spike Dup (B6B0204-MSD1) Source: 6B01003-01 Prepared & Analyzed: 02/01/06

| | | | | | | | | | |
|--------------------------------|------|-----|-------|------|------|------|--------|-------|----|
| Benzene | 39.4 | 2.0 | ug/kg | 40.0 | <2.0 | 98.5 | 70-130 | 0.506 | 40 |
| Bromoform | 33.0 | 5.0 | ug/kg | 40.0 | <5.0 | 82.5 | 70-130 | 5.31 | 40 |
| Chlorobenzene | 40.4 | 5.0 | ug/kg | 40.0 | <5.0 | 101 | 70-130 | 0.985 | 40 |
| Chloroform | 36.0 | 5.0 | ug/kg | 40.0 | <5.0 | 90.0 | 70-130 | 1.68 | 40 |
| 1,1-Dichloroethane | 38.4 | 5.0 | ug/kg | 40.0 | <5.0 | 96.0 | 70-130 | 1.04 | 40 |
| 1,1-Dichloroethylene | 37.0 | 5.0 | ug/kg | 40.0 | <5.0 | 92.5 | 70-130 | 3.30 | 40 |
| cis-1,2-Dichloroethylene | 37.8 | 5.0 | ug/kg | 40.0 | <5.0 | 94.5 | 70-130 | 1.06 | 40 |
| 1,2-Dichloropropane | 39.8 | 5.0 | ug/kg | 40.0 | <5.0 | 99.5 | 70-130 | 1.01 | 40 |
| Ethylbenzene | 43.0 | 2.0 | ug/kg | 40.0 | <2.0 | 108 | 70-130 | 1.39 | 40 |
| Methyl-tert-Butyl Ether (MTBE) | 35.8 | 5.0 | ug/kg | 40.0 | <5.0 | 89.5 | 70-130 | 8.75 | 40 |
| n-Propylbenzene | 40.0 | 5.0 | ug/kg | 40.0 | <5.0 | 100 | 70-130 | 1.01 | 40 |
| Tetrachloroethylene (PCE) | 45.2 | 5.0 | ug/kg | 40.0 | <5.0 | 113 | 70-130 | 5.45 | 40 |

Eydie Schwartz

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 Project Manager

LABORATORY ANALYSIS RESULTS

Project No: NA
 Project Name: Burbank / Disney

AA Project No: A64201
 Date Received: 01/31/06
 Date Reported: 02/14/06

| Analyte | Reporting Result | Limit | Units | Spike Level | Source | %REC Result | %REC | RPD Limits | RPD | Limit | Notes |
|---------------------------------------------------------------------------------------|------------------|-------|-------|-------------|--------|-------------|--------|------------|-----|-------|-------|
| VOCs by GC/MS - Quality Control | | | | | | | | | | | |
| Batch B6B0204 - EPA 5030B | | | | | | | | | | | |
| Matrix Spike Dup (B6B0204-MSD1) Source: 6B01003-01 Prepared & Analyzed: 02/01/06 | | | | | | | | | | | |
| Continued | | | | | | | | | | | |
| Toluene | 42.4 | 2.0 | ug/kg | 40.0 | <2.0 | 106 | 70-130 | 0.471 | 40 | | |
| 1,1,1-Trichloroethane | 33.4 | 5.0 | ug/kg | 40.0 | <5.0 | 83.5 | 70-130 | 1.81 | 40 | | |
| Trichloroethylene (TCE) | 37.8 | 5.0 | ug/kg | 40.0 | <5.0 | 94.5 | 70-130 | 2.61 | 40 | | |
| 1,3,5-Trimethylbenzene | 38.0 | 5.0 | ug/kg | 40.0 | <5.0 | 95.0 | 70-130 | 1.06 | 40 | | |
| Vinyl chloride | 39.2 | 5.0 | ug/kg | 40.0 | <5.0 | 98.0 | 70-130 | 4.70 | 40 | | |
| Surrogate: 4-Bromofluorobenzene | 93.2 | | ug/kg | 100 | | 93.2 | 80-120 | | | | |
| Surrogate: Dibromofluoromethane | 81.2 | | ug/kg | 100 | | 81.2 | 80-120 | | | | |
| Surrogate: Toluene-d8 | 103 | | ug/kg | 100 | | 103 | 80-120 | | | | |
| Total Metals CAM 17 - Quality Control | | | | | | | | | | | |
| Batch B6B1001 - EPA 3050B | | | | | | | | | | | |
| Bank (B6B1001-BLK1) Prepared & Analyzed: 02/06/06 | | | | | | | | | | | |
| Antimony | <10 | 10 | mg/kg | | | | | | | | |
| Arsenic | <0.50 | 0.50 | mg/kg | | | | | | | | |
| Barium | <10 | 10 | mg/kg | | | | | | | | |
| Beryllium | <1.0 | 1.0 | mg/kg | | | | | | | | |
| Cadmium | <1.0 | 1.0 | mg/kg | | | | | | | | |
| Chromium | <3.0 | 3.0 | mg/kg | | | | | | | | |
| Cobalt | <3.0 | 3.0 | mg/kg | | | | | | | | |
| Copper | <3.0 | 3.0 | mg/kg | | | | | | | | |
| Lead | <3.0 | 3.0 | mg/kg | | | | | | | | |
| Molybdenum | <5.0 | 5.0 | mg/kg | | | | | | | | |
| Nickel | <3.0 | 3.0 | mg/kg | | | | | | | | |
| Selenium | <0.50 | 0.50 | mg/kg | | | | | | | | |
| Silver | <1.0 | 1.0 | mg/kg | | | | | | | | |
| Thallium | <5.0 | 5.0 | mg/kg | | | | | | | | |
| Vanadium | <10 | 10 | mg/kg | | | | | | | | |
| Zinc | <3.0 | 3.0 | mg/kg | | | | | | | | |
| LCS (B6B1001-BS1) Prepared & Analyzed: 02/06/06 | | | | | | | | | | | |

Eydie Schwartz

Eydie Schwartz
Project Manager

LABORATORY ANALYSIS RESULTS

Project No: NA
 Project Name: Burbank / Disney

AA Project No: A64201
 Date Received: 01/31/06
 Date Reported: 02/14/06

| Analyte | Reporting Result | Reporting Limit | Units | Spike Level | Source Result | %REC %REC | RPD Limits | RPD Limit | Notes |
|----------------------------------------------|------------------|-----------------|-------|-------------|---------------|-----------|------------|-----------|-------|
| Total Metals CAM 17 - Quality Control | | | | | | | | | |
| <i>Batch B6B1001 - EPA 3050B</i> | | | | | | | | | |
| LCS (B6B1001-BS1) Continued | | | | | | | | | |
| Prepared & Analyzed: 02/06/06 | | | | | | | | | |
| Antimony | 51.0 | 10 | mg/kg | 50.0 | 102 | 80-120 | | | |
| Arsenic | 50.6 | 0.50 | mg/kg | 50.0 | 101 | 80-120 | | | |
| Barium | 48.0 | 10 | mg/kg | 50.0 | 96.0 | 80-120 | | | |
| Beryllium | 51.6 | 1.0 | mg/kg | 50.0 | 103 | 80-120 | | | |
| Cadmium | 49.7 | 1.0 | mg/kg | 50.0 | 99.4 | 80-120 | | | |
| Chromium | 49.9 | 3.0 | mg/kg | 50.0 | 99.8 | 80-120 | | | |
| Cobalt | 51.6 | 3.0 | mg/kg | 50.0 | 103 | 80-120 | | | |
| Copper | 49.5 | 3.0 | mg/kg | 50.0 | 99.0 | 80-120 | | | |
| Lead | 51.2 | 3.0 | mg/kg | 50.0 | 102 | 80-120 | | | |
| Molybdenum | 53.1 | 5.0 | mg/kg | 50.0 | 106 | 80-120 | | | |
| Nickel | 49.5 | 3.0 | mg/kg | 50.0 | 99.0 | 80-120 | | | |
| Selenium | 51.8 | 0.50 | mg/kg | 50.0 | 104 | 80-120 | | | |
| Silver | 50.8 | 1.0 | mg/kg | 50.0 | 102 | 80-120 | | | |
| Thallium | 50.3 | 5.0 | mg/kg | 50.0 | 101 | 80-120 | | | |
| Vanadium | 50.0 | 10 | mg/kg | 50.0 | 100 | 80-120 | | | |
| Zinc | 51.4 | 3.0 | mg/kg | 50.0 | 103 | 80-120 | | | |
| LCS Dup (B6B1001-BSD1) | | | | | | | | | |
| Prepared & Analyzed: 02/06/06 | | | | | | | | | |
| Antimony | 51.4 | 10 | mg/kg | 50.0 | 103 | 80-120 | 0.781 | 20 | |
| Arsenic | 50.7 | 0.50 | mg/kg | 50.0 | 101 | 80-120 | 0.197 | 20 | |
| Barium | 48.0 | 10 | mg/kg | 50.0 | 96.0 | 80-120 | 0.00 | 20 | |
| Beryllium | 51.6 | 1.0 | mg/kg | 50.0 | 103 | 80-120 | 0.00 | 20 | |
| Cadmium | 49.6 | 1.0 | mg/kg | 50.0 | 99.2 | 80-120 | 0.201 | 20 | |
| Chromium | 49.8 | 3.0 | mg/kg | 50.0 | 99.6 | 80-120 | 0.201 | 20 | |
| Cobalt | 51.5 | 3.0 | mg/kg | 50.0 | 103 | 80-120 | 0.194 | 20 | |
| Copper | 49.7 | 3.0 | mg/kg | 50.0 | 99.4 | 80-120 | 0.403 | 20 | |
| Lead | 50.4 | 3.0 | mg/kg | 50.0 | 101 | 80-120 | 1.57 | 20 | |
| Molybdenum | 53.1 | 5.0 | mg/kg | 50.0 | 106 | 80-120 | 0.00 | 20 | |
| Nickel | 49.1 | 3.0 | mg/kg | 50.0 | 98.2 | 80-120 | 0.811 | 20 | |
| Selenium | 51.2 | 0.50 | mg/kg | 50.0 | 102 | 80-120 | 1.17 | 20 | |
| Silver | 50.8 | 1.0 | mg/kg | 50.0 | 102 | 80-120 | 0.00 | 20 | |
| Thallium | 49.8 | 5.0 | mg/kg | 50.0 | 99.6 | 80-120 | 0.999 | 20 | |
| Vanadium | 50.2 | 10 | mg/kg | 50.0 | 100 | 80-120 | 0.399 | 20 | |

Eydie Schwartz

Eydie Schwartz
Project Manager

LABORATORY ANALYSIS RESULTS

Project No: NA
 Project Name: Burbank / Disney

AA Project No: A64201
 Date Received: 01/31/06
 Date Reported: 02/14/06

| Analyte | Reporting Result | Reporting Limit | Units | Spike Level | Source %REC | %REC Result | RPD Limits | RPD Limit | Notes |
|----------------------------------------------|--------------------------------------------------|-----------------|-------|-------------|-------------|-------------|------------|-----------|-------|
| Total Metals CAM 17 - Quality Control | | | | | | | | | |
| <i>Batch B6B1001 - EPA 3050B</i> | | | | | | | | | |
| LCS Dup (B6B1001-BS1) Continued | | | | | | | | | |
| Zinc | 51.1 | 3.0 | mg/kg | 50.0 | 102 | 80-120 | 0.585 | 20 | |
| Matrix Spike (B6B1001-MS1) | Source: 6B01003-01 Prepared & Analyzed: 02/06/06 | | | | | | | | |
| Antimony | 49.6 | 10 | mg/kg | 50.0 | <10 | 99.2 | 75-125 | | |
| Arsenic | 46.7 | 0.50 | mg/kg | 50.0 | <0.50 | 93.4 | 75-125 | | |
| Barium | 101 | 10 | mg/kg | 50.0 | 57 | 88.0 | 75-125 | | |
| Beryllium | 51.6 | 1.0 | mg/kg | 50.0 | <1.0 | 103 | 75-125 | | |
| Cadmium | 47.0 | 1.0 | mg/kg | 50.0 | <1.0 | 94.0 | 75-125 | | |
| Chromium | 55.2 | 3.0 | mg/kg | 50.0 | 7.4 | 95.6 | 75-125 | | |
| Cobalt | 53.8 | 3.0 | mg/kg | 50.0 | 4.2 | 99.2 | 75-125 | | |
| Copper | 60.2 | 3.0 | mg/kg | 50.0 | 7.4 | 106 | 75-125 | | |
| Lead | 53.3 | 3.0 | mg/kg | 50.0 | 4.1 | 98.4 | 75-125 | | |
| Molybdenum | 51.7 | 5.0 | mg/kg | 50.0 | <5.0 | 103 | 75-125 | | |
| Nickel | 50.6 | 3.0 | mg/kg | 50.0 | 3.2 | 94.8 | 75-125 | | |
| Selenium | 44.5 | 0.50 | mg/kg | 50.0 | <0.50 | 89.0 | 75-125 | | |
| Silver | 51.0 | 1.0 | mg/kg | 50.0 | <1.0 | 102 | 75-125 | | |
| Thallium | 44.4 | 5.0 | mg/kg | 50.0 | <5.0 | 88.8 | 75-125 | | |
| Vanadium | 68.4 | 10 | mg/kg | 50.0 | 21 | 94.8 | 75-125 | | |
| Zinc | 73.2 | 3.0 | mg/kg | 50.0 | 27 | 92.4 | 75-125 | | |
| Matrix Spike Dup (B6B1001-MSD1) | Source: 6B01003-01 Prepared & Analyzed: 02/06/06 | | | | | | | | |
| Antimony | 51.3 | 10 | mg/kg | 50.0 | <10 | 103 | 75-125 | 3.37 | 40 |
| Arsenic | 47.9 | 0.50 | mg/kg | 50.0 | <0.50 | 95.8 | 75-125 | 2.54 | 40 |
| Barium | 104 | 10 | mg/kg | 50.0 | 57 | 94.0 | 75-125 | 2.93 | 40 |
| Beryllium | 52.8 | 1.0 | mg/kg | 50.0 | <1.0 | 106 | 75-125 | 2.30 | 40 |
| Cadmium | 48.0 | 1.0 | mg/kg | 50.0 | <1.0 | 96.0 | 75-125 | 2.11 | 40 |
| Chromium | 56.6 | 3.0 | mg/kg | 50.0 | 7.4 | 98.4 | 75-125 | 2.50 | 40 |
| Cobalt | 55.0 | 3.0 | mg/kg | 50.0 | 4.2 | 102 | 75-125 | 2.21 | 40 |
| Copper | 61.7 | 3.0 | mg/kg | 50.0 | 7.4 | 109 | 75-125 | 2.46 | 40 |
| Lead | 54.2 | 3.0 | mg/kg | 50.0 | 4.1 | 100 | 75-125 | 1.67 | 40 |
| Molybdenum | 53.0 | 5.0 | mg/kg | 50.0 | <5.0 | 106 | 75-125 | 2.48 | 40 |
| Nickel | 51.6 | 3.0 | mg/kg | 50.0 | 3.2 | 96.8 | 75-125 | 1.96 | 40 |
| Selenium | 45.2 | 0.50 | mg/kg | 50.0 | <0.50 | 90.4 | 75-125 | 1.56 | 40 |

Eydie Schwartz

Eydie Schwartz
Project Manager

LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06

| Analyte | Reporting Result | Limit | Units | Spike Level | Source Result | %REC %REC | RPD Limits | RPD Limit | Notes |
|---------------------------------------------------------------------------------------|------------------|-------|-------|-------------|---------------|-----------|------------|-----------|-------|
| Total Metals CAM 17 - Quality Control | | | | | | | | | |
| Batch B6B1001 - EPA 3050B | | | | | | | | | |
| Matrix Spike Dup (B6B1001-MSD1) Source: 6B01003-01 Prepared & Analyzed: 02/06/06 | | | | | | | | | |
| Continued | | | | | | | | | |
| Silver | 52.3 | 1.0 | mg/kg | 50.0 | <1.0 | 105 | 75-125 | 2.52 | 40 |
| Thallium | 46.0 | 5.0 | mg/kg | 50.0 | <5.0 | 92.0 | 75-125 | 3.54 | 40 |
| Vanadium | 69.9 | 10 | mg/kg | 50.0 | 21 | 97.8 | 75-125 | 2.17 | 40 |
| Zinc | 74.6 | 3.0 | mg/kg | 50.0 | 27 | 95.2 | 75-125 | 1.89 | 40 |
| Total Metals CAM 17 - Quality Control | | | | | | | | | |
| Batch B6B1002 - EPA 7471A Prep | | | | | | | | | |
| Blank (B6B1002-BLK1) Prepared & Analyzed: 02/06/06 | | | | | | | | | |
| Mercury | <0.020 | 0.020 | mg/kg | | | | | | |
| LCS (B6B1002-BS1) Prepared & Analyzed: 02/06/06 | | | | | | | | | |
| Mercury | 0.939 | 0.020 | mg/kg | 1.00 | 93.9 | 85-115 | | | |
| LCS Dup (B6B1002-BSD1) Prepared & Analyzed: 02/06/06 | | | | | | | | | |
| Mercury | 0.935 | 0.020 | mg/kg | 1.00 | 93.5 | 85-115 | 0.427 | 25 | |
| Matrix Spike (B6B1002-MS1) Source: 6B01003-01 Prepared & Analyzed: 02/06/06 | | | | | | | | | |
| Mercury | 1.00 | 0.020 | mg/kg | 1.00 | 0.031 | 96.9 | 75-125 | | |
| Matrix Spike Dup (B6B1002-MSD1) Source: 6B01003-01 Prepared & Analyzed: 02/06/06 | | | | | | | | | |
| Mercury | 0.992 | 0.020 | mg/kg | 1.00 | 0.031 | 96.1 | 75-125 | 0.803 | 25 |

Eydie Schwartz

Eydie Schwartz
Project Manager



LABORATORY ANALYSIS RESULTS

Project No: NA
Project Name: Burbank / Disney

AA Project No: A64201
Date Received: 01/31/06
Date Reported: 02/14/06

Special Notes

- [1] = QM-07 : The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
[2] = SP1 : This result exceeds acceptance criteria.

Page 39 of 39

Letter AJ22. Signatory – City of Burbank –
Community Development Department

Page 40

Eydie Schwartz

Eydie Schwartz
Project Manager

American Analytics □ 9785 Eton Avenue, Chatsworth, California 91311
Tel: (818) 998-5547 □ Fax: (818) 998-7258

Letter AJ23. Signatory – City of Inglewood Public Works Department

Response to Comment AJ23-1

Thank you for your review. Comment noted.

From: "Ray Yeghyayan" <ryeghyayan@cityofinglewood.org>
To: <IRP-EIR@san.lacity.org>
Date: Tue, Mar 7, 2006 4:21 PM
Subject: IRP Draft EIR - Alignment Modifications for the Glendale Burbank
Interceptor Sewer (GBIS)

Hi,

AJ23-1 [Please be advised that subject project will have no impact on City of Inglewood.

Thank you.

Ray Yeghyayan
City of Inglewood
Public Works Department
One Manchester Boulevard
Inglewood, CA 90301
(310) 412-5333

CC: "Eric R. Escobar" <eescobar@cityofinglewood.org>



Congressman Brad Sherman

27th District, California

SERVING THE SAN FERNANDO VALLEY

March 10, 2006

1624
COMMITTEE ON
FINANCIAL SERVICES
—
COMMITTEE ON
INTERNATIONAL RELATIONS
RANKING MEMBER, SUBCOMMITTEE ON
INTERNATIONAL TERRORISM, AND
NONPROLIFERATION
—
COMMITTEE ON
SCIENCE

Mr. Jawahar P. Shah
Wastewater Engineering Services Division
Bureau of Sanitation, Department of Public Works
City of Los Angeles
2714 Media Center Drive
Los Angeles, CA 90065

Dear Mr. Shah:

Thank you for this opportunity to comment on the Integrated Resources Plan Draft Environmental Impact Report (IRP Draft EIR) released by the City of Los Angeles. In response to community input, I urge you to study alternative proposals to the Glendale-Burbank Interceptor Sewer (GBIS) North Alignment alternative in consultation with the City of Burbank and with the expressed support of local residents.

AJ24-1

The City of Burbank has expressed opposition to the GBIS North Alignment alternative. As you know, Burbank officials and residents are concerned with the adverse impacts on air quality, noise and traffic.

I am hopeful you will work closely with the City of Burbank and its residents toward a promising solution that meets the objectives of the IRP and preserves the quality of life in our community. Thank you for your time and attention.

Sincerely,

BRAD SHERMAN
Member of Congress

WASHINGTON, DC OFFICE
1030 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-5911
FAX: (202) 225-5879

SAN FERNANDO VALLEY OFFICE
5000 VAN NUYS BOULEVARD, SUITE 420
SHERMAN OAKS, CA 91403-1791
(818) 501-9200
FAX: (818) 501-1554

E-mail: sherman.personal@mail.house.gov

PRINTED ON RECYCLED PAPER

Web site: bradsherman.house.gov

Letter AJ24. Signatory – Congressman Brad Sherman

Response to Comment AJ24-1

Regarding your comments on the GBIS North Alignment; refer to Section 1.5.2.2 of this Final EIR. The staff recommended GBIS Alignment would use the eastern portion of the GBIS South Alignment and the western portion of the GBIS North Alignment. The staff recommended alignment addresses many of the concerns expressed by residents of the City of Burbank. Also see response comment AJ1-1.

JUDICIARY COMMITTEE
SUBCOMMITTEE ON COURTS, THE INTERNET
AND INTELLECTUAL PROPERTY

INTERNATIONAL RELATIONS
COMMITTEE

SUBCOMMITTEE ON
THE MIDDLE EAST AND CENTRAL ASIA

SUBCOMMITTEE ON
OVERSIGHT AND INVESTIGATIONS

SUBCOMMITTEE ON INTERNATIONAL
TERRORISM AND NONPROLIFERATION

DEMOCRATIC STUDY GROUP
ON NATIONAL SECURITY
Co-FOUNDER AND Co-CHAIR

SENIOR WHIP



ADAM B. SCHIFF
29TH DISTRICT, CALIFORNIA

February 14, 2006

Mr. Jawahar P. Shah
Wastewater Engineering Services Division
Bureau of Sanitation, Department of Public Works
City of Los Angeles
2714 Media Center Drive
Los Angeles, CA 90065

Dear Mr. Shah:

I respectfully request your strong consideration of the recommendations included in the letter submitted by the City of Burbank regarding the City of Los Angeles' Integrated Resources Plan Draft Environmental Impact Report (Draft EIR). Specifically, I encourage you to recognize the convincing points expressed by the City of Burbank as to the disadvantages of the Glendale-Burbank Interceptor Sewer (GBIS) North Alignment alternative.

AJ25-1

The City of Burbank has identified many salient reasons why the GBIS North Alignment alternative should be rejected. Because of the scope of the project as well as the length of estimated construction time, the GBIS North Alignment alternative would negatively impact Burbank residents and businesses because of the close proximity of the project's infrastructure to established, populated areas. Most significant are concerns over air quality, noise levels and increased traffic.

Please take into consideration the quality of life of area residents when making your decision. Thank you for your attention to this matter.

Sincerely,

ADAM B. SCHIFF
Member of Congress

WASHINGTON OFFICE:
326 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-4176
FAX: (202) 225-5828

DISTRICT OFFICE:
BRALEY BUILDING
35 SOUTH RAYMOND AVENUE
SUITE 205
PASADENA, CA 91105
(626) 304-2727
FAX: (626) 304-0572

E-MAIL VIA WEB ADDRESS AT:
www.house.gov/schiff

Letter AJ25. Signatory – Congressman Adam Schiff

Response to Comment AJ25-1

The City has considered the many comments submitted by residents of the City of Burbank expressing concerns about the GBIS North Alignment. The staff recommended GBIS Alignment, described in Section 1.5.2.2 of this Final EIR, would use the eastern portion of the GBIS South Alignment and the western portion of the GBIS North Alignment. This staff recommended GBIS Alignment addresses many of the concerns expressed by residents of the City of Burbank and would avoid many of the potential impacts associated with the GBIS North Alignment.



STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Arnold
Schwarzenegger
Governor

January 13, 2006

Ara Kasparian
City of Los Angeles
650 S. Spring Street, Suite 574
Los Angeles, CA 90014

Subject: Integrated Resources Plan
SCH#: 2004071091

Dear Ara Kasparian:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 12, 2006, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

AJ26-1

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency



Sean Walsh
Director

Letter AJ26. Signatory – State Clearinghouse

Response to Comment AJ26-1

The acknowledgement letter by the California Office of Planning and Research (State Clearinghouse) noting receipt of the Draft EIR and that the City of Los Angeles has complied with the State Clearinghouse review requirements is noted.

Document Details Report
State Clearinghouse Data Base

2a

SCH# 2004071091
Project Title Integrated Resources Plan
Lead Agency Los Angeles, City of

Type EIR Draft EIR
Description IRP is the Facilities Plan for water, wastewater and stormwater related facilities and needs of the area for the year 2020 and beyond. Project includes expansion and upgrade of existing facilities, up to three new interceptor sewers, expanded recycled water distribution systems, and dry and wet weather urban runoff management facilities.

Lead Agency Contact

| | |
|----------------|----------------------------------|
| Name | Ara Kasparyan |
| Agency | City of Los Angeles |
| Phone | (213) 847-8815 |
| email | |
| Address | 650 S. Spring Street, Suite 574 |
| City | Los Angeles |
| | State CA Zip 90014 |

Fax

Project Location

| | |
|----------------------|----------------------|
| County | Los Angeles |
| City | Los Angeles, City of |
| Region | |
| Cross Streets | Citywide |
| Parcel No. | |
| Township | |
| Range | |
| Section | |
| Base | |

Proximity to:

| | |
|------------------|---------------------------------------------------|
| Highways | 101, 110, 5, 10 |
| Airports | LAX, Burbank, Van Nuys |
| Railways | Metrolink, Amtrak, MTA, SP |
| Waterways | Los Angeles River, Santa Monica Bay, Public Ocean |
| Schools | LAUSD, Glendale SD, Burbank SD, El Segundo |
| Land Use | Public Facilities |

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Vegetation; Water Quality; Water Supply; Wetland/Riparian

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 4; Department of Parks and Recreation; Native American Heritage Commission; Department of Health Services; Department of Fish and Game, Marine Region; Department of Fish and Game, Region 5; Department of Water Resources; California Coastal Commission; California Highway Patrol; Caltrans, District 7; Department of Toxic Substances Control; State Water Resources Control Board, Division of Water Rights; State Water Resources Control Board, Clean Water Program; State Lands Commission

Date Received 11/29/2005 **Start of Review** 11/29/2005 **End of Review** 01/12/2006

Letter AJ26. Signatory – State Clearinghouse

Page 2

Note: Blanks in data fields result from insufficient information provided by lead agency.

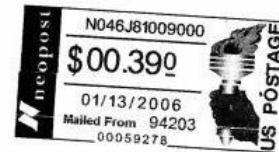
Letter AJ26. Signatory – State Clearinghouse

Page 3

State of California.

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
STATE CLEARINGHOUSE
P.O. BOX 3044
SACRAMENTO, CALIFORNIA 95812-3044

30014+1307-33 C006



21a

CITY OF BURBANK
OFFICE OF THE CITY MANAGER

March 30, 2006

Jawahar P. Shah
City of Los Angeles
Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, California 90065

Dear Mr. Shah:

AJ41-1

The proposed Glendale-Burbank Interceptor Sewer (GBIS), a component of the Integrated Resources Plan Draft Environmental Impact Report (EIR) released by the City of Los Angeles, has created serious concerns among many of the residents of the City of Burbank. The residents have expressed their concerns at Burbank City Council Meetings and through e-mails and letters.

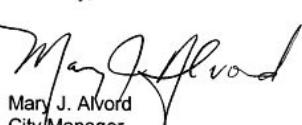
AJ41-2

City of Burbank staff has encouraged residents to submit their letters to the City of Los Angeles in order to have their concerns answered in the Final EIR. Although many residents sent their letters to Los Angeles directly, there were also many residents who have sent their letters and e-mails to our office. Therefore, we are forwarding these letters and e-mails to your office as official comments on the Draft EIR, for which the City of Burbank and respective residents expect the City of Los Angeles will prepare formal responses as required by the California Environmental Quality Act.

Furthermore, a representative sample of the concerns expressed at City of Burbank Council Meetings is being submitted on a DVD for your review and response. This 20-minute video was compiled from the hours of verbal testimony given by residents, Burbank City staff and Burbank City Council Members.

If you have questions for City of Burbank staff, please contact Rodney Andersen at (818) 238-3931.

Sincerely,



Mary J. Alvord
City Manager

H:\My Documents\GBIS - L.A. Sewer DEIR-Forwarded Resident Letters.doc\kb

Letter AJ30. Signatory – City of Burbank

Response to Comment AJ30-1

Comment noted. Section 1.5.2.2 of this Final EIR identifies the staff recommended GBIS Alignment, which minimizes concerns about potential impacts that were expressed by numerous Burbank residents and in other letters submitted by the City of Burbank.

Response to Comment AJ30-2

Comment noted. Responses to comments submitted on the Draft EIR during the 120-day public review period are in this Final EIR.

Attachment: Correspondences from City of Burbank Residents
DVD of Representative Testimony from City of Burbank Council Meetings

cc: Los Angeles City Council Member Tom LaBonge
Los Angeles City Council Member Wendy Greuel
Los Angeles City Council Member Ed Reyes
Los Angeles City Council Member Dennis P. Zine
Los Angeles City Council Member Jack Weiss
Los Angeles City Council Member Tony Cardenas
Los Angeles City Council Member Alex Padilla
Los Angeles City Council Member Bernard Parks
Los Angeles City Council Member Jan Perry
Los Angeles City Council Member Herb J. Wesson, Jr.
Los Angeles City Council Member Bill Rosendahl
Los Angeles City Council Member Greig Smith
Los Angeles City Council Member Eric Garcetti
Los Angeles City Council Member Jose Huizar
Los Angeles City Council Member Janice Hahn
Burbank Council Mayor Jef Vander Borght
Burbank Council Vice Mayor Todd Campbell
Burbank Council City Member Dave Golonski
Burbank Council City Member David W. Gordon
Burbank Council City Member Marsha R. Ramos

CITY OF BURBANK
OFFICE OF THE CITY COUNCIL

1936

March 30, 2006

Jawahar P. Shah
City of Los Angeles
Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, California 90065

Dear Mr. Shah:

A recent e-mail correspondence from Los Angeles City Councilmember Tom LaBonge suggested that a new alignment be considered for the Glendale-Burbank Interceptor Sewer (GBIS). It is our understanding that this new "hybrid" alignment would connect the eastern portion of the GBIS South Alignment along Forest Lawn Drive with the western portion of the GBIS North Alignment in Riverside Drive through Clybourn Avenue, Rose Street, or Pass Avenue. This hybrid alignment is also discussed in the Joint Report to City Council Motion 06-0234 where it is named Modified Alignment No. 1.

As discussed in a previous letters sent by the City of Burbank, we have serious concerns regarding the significant adverse environmental impacts that would be created by either the northern alignment or Modified Alignment No. 1. The environmental impact analysis of the northern alignment is legally inadequate. Further, there is no analysis of Modified Alignment No. 1. Although it primarily consists of the eastern half of the southern alignment and the western half of the northern alignment, this alternative could require additional shaft sites or air treatment facilities; none of which are described or analyzed in the Draft EIR. These and other legal inadequacies in the Draft EIR deprive the public of a meaningful opportunity to review the significant adverse impacts of the GBIS. Therefore, both the GBIS North Alignment and the Modified Alignment No. 1 must be rejected.

In addition to suggesting Modified Alignment No. 1, the Joint Report to City Council Motion 06-0234 dismissed an alignment alongside the Los Angeles River as a feasible alternative. Alignment alternatives alongside the Los Angeles River are considered in this report under names Modified Alignment No. 2 and 3. The report stated that these alignment alternatives may encounter major rocks which would halt tunneling operation. The City of Burbank believes that that the rejection of Modified Alignment No. 2 and 3 in this report are based on unfounded assertions as explained in the attached letter from Richard C. Slade, a registered geologist.

As explained in this letter, the Los Angeles River has not always been located in its current channelized location, but has meandered several hundred feet or more from its present location. Therefore, the likelihood of encountering boulders alongside the current Los Angeles River channel is not greater than an alignment farther to the north under public streets.

Furthermore, the likelihood of encountering boulders is further diminished because this reach of the river is far away from the steep, upgradient reaches of the headwater areas of the river. It is highly unlikely that the Los Angeles River could have had a sufficient flow volume or flow velocity to deposit massive boulders in the reach being considered for the GBIS tunnel.

AJ31-1

AJ31-2

275 E. Olive Avenue • P.O. Box 6459 • Burbank, California 91510-6459 • (818) 238-5751 • FAX (818) 238-5757

Letter AJ31. Signatory – City of Burbank

Response to Comment AJ31-1

The commenter is referred to responses to comments AJ1-1 through AJ1-24, which support the adequacy of the analysis of the GBIS alignments evaluated in the Draft EIR. The staff recommended GBIS Alignment described in Section 1.5 of this Final EIR is the same alignment that the commenter refers to as the Modified Alignment No. 1. As described in Section 1.5, the staff recommended GBIS Alignment would be constructed from the Pecan Grove, Travel Town, Barham, and Caltrans North Hollywood Maintenance Yard Shaft Sites, as evaluated throughout the Draft EIR under the GBIS South Alignment. In addition, the staff recommended GBIS Alignment would place ATFs at the Pecan Grove site and the Caltrans Maintenance Yard, as described in the Draft EIR under the GBIS South Alignment. The commenter is also referred to the responses to comment letter AJ13, which demonstrates that the public would not be deprived of meaningful review and input on the Draft EIR because no new significant impacts are identified, substantial increases in the severity of the impacts disclosed in the Draft EIR would not occur, and responding to the comments on the Draft EIR has not resulted in substantial new information. As a note, Section 1.5.2.2 of this Final EIR describes the staff recommended GBIS Alignment.

Response to Comment AJ31-2

This comment refers a feasibility analysis of a GBIS alignment along the Los Angeles River Channel that was presented to the Los Angeles City Council on March 17, 2006 (Appendix E of this Final EIR contains a copy of the Joint Report to City Council Motion 06-0234). Contrary to the comment, the Joint Report does not state that Los Angeles River alignment alternatives may encounter major rocks that would halt tunneling operation. Rather, the Joint Report states that there are significant geologic conditions below ground that suggest an alignment directly beneath the river may be problematic during construction. The Joint Report also states that deposition of layer upon layer of sediment, such as sand, cobbles, and extremely large boulders, has occurred over centuries and exists directly beneath the river along its present alignment.

and that because of the potential to encounter the large boulders, and because the large boulders can derail tunneling operations, it is not desirous to use a tunneling corridor that maximizes exposure to potential large boulders.

Regarding the comment that the City of Burbank believes that the rejection of Modified Alignment No 2 and No. 3 (Los Angeles River alignments) are based on unfounded assertions as explained in the attached letter from Richard Slade, a registered geologist, the City disagrees because actual subsurface soil conditions encountered in past City geotechnical evaluations result in conclusions that are contrary to Mr. Slade's opinions. In addition, the Joint Report evaluated numerous issues, not just subsurface soil conditions, and these considerations are explained in the response to comment AJ31-4 below. In addition, as explained in Section 1.5.2.2, the City considered other factors besides subsurface soil conditions in identifying the staff recommended GBIS Alignment. These factors are discussed in Section 1.5.2.2 and include concerns about potential impacts, contingency response issues, and system risks. Regarding the latter item, there are currently two large diameter sewers present in Valley Spring Lane and the placement of the GBIS beneath this street would subject the outfall conveyance system in the Valley to increased risk by concentrating conveyance capacity beneath a single street. As a consequence, the GBIS South Alignment was not recommended for implementation.

The commenter is correct that the Los Angeles River has historically meandered from its current channelized location. The commenter states there is a diminished likelihood of encountering large boulders along the Los Angeles River in the vicinity of the GBIS alignments because this section of the Los Angeles River is a great distance from the headwaters and the historic Los Angeles River could not have had sufficient flow or velocity to deposit massive boulders. This is an opinion of the commenter. The City's Geotechnical Engineering Division, however, disagrees with the opinion that large boulders along the Los Angeles River are unlikely to occur. The City has encountered boulders approximately 2 feet in diameter in shallow (about 20 feet below ground surface) alluvial sediments. Boulders were also encountered in the ancestral Los Angeles River beneath Burbank Boulevard between Cahuenga Boulevard and Lankershim Boulevard. The presence of boulders at shallow depths is problematic for tunnel boring machines because the boulders can partially break free of the surrounding soils and move as the tunnel boring machine attempts to mine them. This results in engineering construction and safety concerns. In severe cases, the boulders will have to be excavated with conventional equipment. At depth, the same size boulders typically pose less of a problem because the weight and density of the surrounding soil hold the boulder steady while the tunnel boring machine cuts through it. In addition to boulders, irregularly shaped concretions or concretionary beds have been encountered. The hardness of these concretions can approach or exceed the strength of granitic boulders.

Regarding other comments provided by Mr. Slade, the comment suggests that significant inflows of groundwater would not be as likely to occur during tunneling in the granite or older sedimentary rock near the hills compared to tunneling with the valley floor to the north. The City's Geotechnical Engineering Division staff disagrees with this opinion. Groundwater flowing through fractures can represent a significant groundwater inflow. Nevertheless, groundwater inflows into the tunnel from fractured rock or alluvium are reduced to very low quantities by using the tunnel boring machine in a mode that pressurizes the cutting face. During NEIS, water pressures in the deep alluvial sediments exceeded 3 bars; however the tunnel boring machine operator pressurized the cutting face at a higher pressure (roughly 3.3 bars) and limited water infiltration. Importantly the deep alluvial soils NEIS penetrated were very well consolidated and had lower porosity than the shallower soils. Fractures in rock can deliver water into a tunnel excavation; however, the tunnel boring machine cutting face can be pressurized to minimize water infiltration.

Mr. Slade suggests that more groundwater disposal will be required for a tunnel alignment through alluvial sediments and that tunneling in the rock will result in greatly reduced volumes of groundwater to pump out of the tunnel and subsequently dispose. As stated above, groundwater infiltration into the tunnel was kept to a minimum NEIS tunneling by pressurizing the tunnel boring machine's cutting head. Groundwater inflows are not anticipated to be markedly different from a rock versus alluvial tunnel due to the use of a tunnel boring machine with the capability to pressurize the cutting head.

Mr. Slade suggests that groundwater removed from the tunnel during construction will be clarified in Baker tanks, and discharged to the Los Angeles River under a National Pollution Discharge Elimination System permit. This is not likely. During NEIS tunneling, groundwater removed from the tunnel

AJ31-3

Even if boulders were encountered, adequate technology and construction methods exist to perform tunneling operation through varying conditions. Tunneling is a construction field that comes with a wide range of equipment options and has been used successfully for many years. Many recent advances in tunneling technology allow for sustained production rates even in difficult or changeable soil conditions. The five years available before the construction of the GBIS sewer tunnel will provide Los Angeles sufficient time to evaluate the most recent tunneling technologies.

AJ31-4

The City of Burbank does not believe that an alignment alongside the Los Angeles River has been fully analyzed in the Draft EIR. In light of CEQA's mandate that a public agency should not approve a project where feasible alternatives would substantially lessen significant environmental impacts (14 Cal. Code Regs. § 15021), the City of Burbank urges the City of Los Angeles to perform a CEQA analysis of an additional alignment alternatives, including an alignment under the current channelized Los Angeles River.

AJ31-5

The deficiencies in the Draft EIR described in this letter, as well as those articulated in the City's previous comment letters, require the addition of significant new information to the Draft EIR (e.g., detailed project descriptions for Modified Alternatives No. 1, 2 and 3; detailed environmental impact analyses for each of these alternatives; and a comparative analysis of all GBIS alignment alternatives). Further, the modified alternatives are proposed in communities not previously addressed in the Draft EIR, with effects upon residents who may have not been concerned about the alternative alignments initially described in the Draft EIR. Therefore, after it has been revised, the Draft EIR must be recirculated for additional public review and comment. Failure to do so will clearly deprive the public of both a meaningful opportunity to review and comment upon substantial adverse environmental effects of the GBIS and feasible ways to mitigate or avoid such adverse effects.

If you have questions for City of Burbank staff, please contact Rodney Andersen at (818) 238-3931.

Sincerely,

Jef Vander Borgh
Mayor

David W. Gordon
Council Member

Attachment: Letter from Richard C. Slade, Principal Groundwater Geologist

c: Los Angeles Councilmember Tom LaBonge
Los Angeles Councilmember Wendy Gruel
Los Angeles Board of Public Works

H:\WPDOCS\Wander Borgh\LA_Sewer DEIR-LA_River Route.lir.doc

Letter AJ31. Signatory – City of Burbank

Page 2

was clarified in Baker tanks but discharged to the City's sewer system under an industrial waste permit, and the same management system would be employed for GBIS construction.

Mr. Slade raises the possibility of a water-rights concern by the office of the Watermaster of the San Fernando Valley surrounding the disposal of groundwater and that the Watermaster office's concerns could be higher if the tunneling is done through the alluvium because of a possible higher groundwater inflow. Coordination with the Department of Water and Power regarding GBIS construction issues has occurred, and the Watermaster has not expressed concerns regarding water rights. As stated before, the use of a pressurized face on the tunnel boring machine greatly reduces water infiltration, thereby reducing the water treatment and disposal concerns. To reiterate, past experience with NEIS did not indicate that groundwater inflows were substantially different in soil versus rock.

Response to Comment AJ31-3

Comment noted. The commenter is also referred to the response to comment AJ31-2. Although current tunneling methods and technology can handle varying conditions, mixed face or mixed soil and rock conditions can pose difficulties during the tunneling process.

Response to Comment AJ31-4

The commenter is correct that a Los Angeles River alignment is not analyzed in the Draft EIR. Two Los Angeles River alignments were discussed in the Joint Report presented to the Los Angeles City Council on March 17, 2006 (Appendix E contains the Joint Report), but both were dropped from further consideration based on engineering recommendations. The Joint Report evaluates the feasibility of two Los Angeles River alignments for GBIS based on the following issues that are discussed below: (1) other potential Los Angeles River Uses, (2) Constructability, (3) Risk, and (4) Real Estate Requirements.

The Los Angeles River is the subject of active revitalization planning, concepts of which include the green belts and public access areas that would reduce the capacity of the river as a flood control channel.

To compensate for potential loss of flood conveyance capacity, planning efforts have included the installation of the culverts under the river's levees and access roads to provide additional conveyance capacity that would offset the loss of capacity from the revitalization projects. The placement of GBIS within the Los Angeles River right-of-way could not occur beneath the main channel, because GBIS would require maintenance hole structures that could not be located along the river bottom. Because of this, GBIS would have to be placed along the side of the channel to allow the maintenance hole structures to reach the surface away outside of the main flood control channel. Potential flood culverts placed behind the river levees or beneath the access roadway along the river would conflict with the need to have maintenance hole structures reach the ground surface.

Regarding constructability, construction of a large sewer using tunneling methods requires various construction shaft sites to house the shaft that extends underground and to stage equipment, excavated storage, haul and supply trucks, tunnel segments, and other required materials. Tunnel shaft sites are typically over 1 acre in area. The access road or easement along the river is not wide enough to accommodate tunneling shaft sites. In addition, construction of GBIS would take approximately 3 years, and tunneling construction of the magnitude required for GBIS could not be completed during the non-rainy season, which is about 6 months. The Joint Report also identifies the potential to encounter boulders, and this potential is discussed under the response to comment AJ31-2 above. On the basis of the limited widths of the access road and easement along the Los Angeles River channel, an alignment within the Los Angeles River right-of-way was not recommended because construction would extend into several rainy seasons.

The Los Angeles River drains a large portion of the City of Los Angeles, and represents a critical structure from an engineering standpoint. Damage to the Los Angeles River could have widespread flooding and other effects, and good engineering practice and prudent risk management procedures dictate a GBIS alignment that minimizes exposure to critical structures, such as the Los Angeles River. Minimizing exposure to critical structures is typically accomplished by minimizing the number or length of critical structure crossings. In the context of the Los Angeles River, a GBIS alignment within the Los Angeles River would maximize rather than minimize risks to the river as a critical structure and is therefore not recommended in the Joint Report.

Lastly, the Joint Report discloses that the Los Angeles River right-of-way comprises private properties on which a public easement has been granted for flood control and drainage purposes. The flood control easements do not allow for the placement of other utilities such as sewers, and as such, extensive right-of-way acquisition activities would be required to obtain a sewer easement for GBIS.

Due to the potential for use conflicts related to the revitalization of the Los Angeles River, constructability issues, potential risks, and the need to acquire extensive easements, the Joint Report recommends against implementing a GBIS alignment within the Los Angeles River right-of-way. In addition, as part of the coordination that occurred between staff of the City of Los Angeles and the City of Burbank (see Section 1.3, Additional Coordination), additional evaluation of an alignment under the Los Angeles River channel occurred. Besides the issues evaluated in the Joint Report, the other issues that were considered included the potential for river flows to enter the tunnel, the lack of contingency options to retrieve the tunneling machine from the Los Angeles River right-of-way, difficulty in providing settlement control such as surface grouting, and difficulty in connecting with other sewers. These issues support elimination of Los Angeles River alignments as a viable GBIS alignment.

Lastly, as outlined in the Joint Report and supported in subsequent coordination effort with the City of Burbank (see Section 1.3), a GBIS alignment within the Los Angeles River right-of-way is not recommended. Furthermore, based on information in the Joint Report, there could be substantial risks associated with constructing and operating a large sewer beneath a critical structure such as the Los Angeles River, and it is likely that such an alignment would result in greater potential for impacts than an alignment outside of the river. Consequently, a GBIS alignment along the Los Angeles River does not represent a feasible alignment alternative for GBIS and the inclusion of a GBIS alignment within the Los Angeles River right-of-way in the Draft EIR is not warranted. Furthermore, other alignments were suggested, such as an alignment beneath the Lakeside Golf Course. It is the City's policy to place public infrastructure within public rights-of-way or publicly owned land where feasible to avoid impacts to private property and to provide access for maintenance, inspection, repairs, and other activities that may be required in the future. Because of this, a GBIS alignment beneath the Lakeside Golf course was not considered further. It should be noted that the staff recommended GBIS Alignment, described in Section 1.5.2.2 of this Final EIR, would

avoid many of the impacts associated with the GBIS North Alignment, the concerns of which were expressed to the City in numerous comment letters from both the City of Burbank and many residents of the City of Burbank.

Response to Comment AJ31-5

Regarding the comment that previous comments submitted by the City of Burbank on the Draft EIR require the addition of new information which would in turn require that the Draft EIR must be recirculated, refer to response to comment AJ13-2. Regarding the comment that the Modified Alignments No. 1, 2, and 3 are proposed in communities that were not previously addressed in the Draft EIR, the commenter is referred to the Joint Report to Council Motion (Appendix E) which recommended against a Los Angeles River alignment for GBIS (Modified Alignments No. 2 and No. 3) and recommended the Modified Alignment No. 1 for clarification in the IRP EIR. The Modified Alignment No. 1 identified in the Joint Report is represented by the staff recommended GBIS Alignment described in Section 1.5.2.2 of this Final EIR. The staff recommended GBIS Alignment is essentially a combination of the eastern portion of the GBIS South Alignment and western section of the GBIS Northern Alignment that is connected with a short (approximately $\frac{1}{2}$ mile) section of tunnel entirely beneath Pass Avenue. This section of Pass Avenue, and the staff recommended GBIS Alignment as a whole, are located in the same general vicinity and communities as those associated with the GBIS North Alignment and the GBIS South Alignment, as discussed in the Draft EIR. Figure 1-1 depicts the staff recommended GBIS Alignment overlaid on the GBIS North and South Alignments, and specifically shows that the Pass Avenue section is located in the same general vicinity and communities as the GBIS North and South Alignments.

Regarding the contention that failing to recirculate the Draft EIR would deprive the public of both a meaningful opportunity to review and comment upon substantial adverse effects of GBIS and feasible ways to mitigate or avoid such adverse effects, refer to the discussion of the staff recommended GBIS Alignment in Section 1.5.2.2, response to comment AJ13-2, and the responses to comments AJ1-1 through AJ1-24, the latter of which support the adequacy of the analysis of the GBIS alignments. Furthermore, over 2,700 comment letters were received over the 120-day public review and comment period. The majority of comments focused on the GBIS North Alignment, the GBIS South Alignment, and/or the staff recommended GBIS Alignment (generally denoted as the hybrid alignment in the comments). Based on the number of comments received and the extensive public review and comment period for the Draft EIR, more than ample opportunity has been provided for the public to review the impacts of the GBIS alignments and provide comments. In addition, the staff recommended GBIS Alignment represents an alignment that substantially lessens the adverse environmental effects associated with the GBIS North Alignment and to an extent the GBIS South Alignment.



March 28, 2006

To: Mr. Rodney A. Anderson, P.E.
City of Burbank
Public Works Department
275 East Olive Avenue
P.O. Box 6459
Burbank, California 91510-6459

Job No. 312-LAS01

From: Richard C. Slade, Principal Groundwater Geologist
RG, CEG in California
Richard C. Slade & Associates LLC

Re: Preliminary Discussion of Key Factors for Alternative Alignments
Glendale/Burbank Interceptor Sewer (GBIS)
Vicinity Los Angeles River
Between Burbank and North Hollywood

This Memorandum has been prepared to provide our preliminary discussion of key factors for alternative alignments for the proposed Glendale/Burbank Interceptor Sewer (GBIS), in the vicinity of the Los Angeles River along the southern margin of the San Fernando Groundwater Basin. The alternative alignments discussed herein are those shown on a Draft map titled, EIR Alignments (Modified) and dated March 15, 2005.

Due to the time constraints imposed on this project, our work and our opinions provided herein were limited to:

- our long-term experience in hydrogeology, including prior projects for the nearby cities of Burbank and Glendale;
- our cursory review of driller's logs in our office files for historically-drilled water wells in the area;
- review of a few recent emails prepared by others for the projects;
- our review of selected geologic maps of the area which show the various earth materials mapped at ground surface by others;
- and a brief review of the report of the July, 1962 Report of Referee prepared for the final adjudication of the groundwater resources of the San Fernando Groundwater Basin.

Also due to the time constraints, there was no time available to conduct any field reconnaissance visits, or to perform drilling exploration, laboratory testing or pumping tests in any water wells or groundwater monitoring wells in the project area.

Selected Key Factors to Consider

The key factor when considering the sewer tunnel alignment is the subsurface geologic conditions. Geologic earth materials that could be encountered during construction could include: deeply weathered to hard crystalline granitic-type rocks or older sedimentary rocks within the shafts or tunnels constructed within the Santa Monica Mountains; relatively much younger alluvial deposits beneath and adjacent to the current channel of the Los Angeles River; and/or older sedimentary strata that may underlie the alluvial deposits beneath and/or adjacent to the river alluvium.

None of the above earth materials are likely to contain the "major rocks" or even "boulders" that have been reported by others to be a significant detriment to the proposed tunneling method(s). "Major rocks," from a geologic perspective, would only be the granite to be encountered along the "Zoo Branch" alignment between the Pecan Grove Site on the east and the Travel Town Shaft Site on the west. However, even if hard granite or cemented sedimentary rocks were to be encountered along some of this alignment, tunneling should be able to readily proceed. Very importantly, during tunneling in the granite and/or older sedimentary rocks in the hillsides, significant inflows of groundwater would not be as likely to occur as they would during tunneling on the valley floor to the north. This would provide several major benefits: greatly reduced rates and volumes to pump out; greatly reduced volumes of groundwater to temporarily store in Baker tanks and subsequently treat for total suspended solids prior to discharge to the Los Angeles River in accordance with National Pollutant Discharge Elimination System (NPDES) regulations; and greatly reduced potential to encounter groundwater contamination by volatile organic compounds (VOCs), thereby precluding expensive VOC treatment of the groundwater prior to its discharge. Further, there may be fewer significant issues with the Watermaster of the San Fernando Groundwater Basin dealing with pumping rights from this hard rock.

Further, "boulders," defined from a geologic perspective, signifies a rock (or clast) size that is equal to or greater than approximately 10 inches in size. Certainly, from a tunneling

perspective, rock clasts of 10 inches or more in size will likely be encountered in the alluvium along the river. Such clast sizes could also be encountered in some of the older sedimentary strata that underlie the river alluvium. However, it is known that the Los Angeles River has meandered laterally (moved around) perhaps several hundred feet or more from its present location. Hence, the alignment, width and thickness of the geologically young river alluvium have historically varied over time; these alluvial sediments have been cut into the somewhat geologically older sedimentary strata that comprise the remainder of the San Fernando Groundwater Basin. Due to these facts regarding the ancestral river, the gravels, cobbles and rare boulders (rock clasts greater than 10 inches in size) of the alluvium could be encountered at depth both along the current river alignment but also within a few hundred feet on either side of the current alignment. As a result, driving a tunnel beneath the current river course would not likely encounter substantially more boulders than an alignment to the north beneath the urbanized area.

It must be recognized when reviewing driller's logs of water wells in the region that drillers are not geologists. They tend to use and record their own special terms for the drill cuttings they see as drilling proceeds. Several driller's logs mention "gravel and boulders" in the drill cuttings but they sometimes even simultaneously say these "gravel and boulders" are "3 inches to 5 inches" in size (e.g., see log of Well 3844C or 3904J). Hence, the driller's term for "boulders" is really the more accurate geologic term for cobbles (rock clasts smaller than 10 inches in size).

Lastly, in regard to "boulders," it is considered to be highly unlikely that huge boulders would be encountered anywhere along any proposed tunnel alignment within the alluvium of the river. This is simply because this reach of the river is a very long distance from the topographically steep, upgradient reaches of the headwater areas of the river. That is, the reach of the river in the tunnel area is a long distance from the headwaters; any historic Los Angeles River could not have had a sufficient flow volume or flow velocity to deposit large accumulations of massive boulders in this reach, which otherwise might be considered a problem for tunneling.

CITY OF BURBANK
OFFICE OF THE CITY MANAGER

March 30, 2006

Jawahar P. Shah
City of Los Angeles
Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, California 90065

Dear Mr. Shah:

AJ32-1

The City of Burbank recently received a copy of the Joint Report to City Council Motion 06-0234 (Joint Report). As discussed in previous comment letters dated March 22 and March 30, 2006 from the Burbank City Council, we disagree with the Joint Report's assertion that the hybrid alignment has been sufficiently analyzed in the Draft Environmental Impact Report (EIR). Rather, the modified alternatives listed in the Joint Report are proposed in communities not previously addressed in the Draft EIR. Therefore, after it has been revised, the Draft EIR must be recirculated for additional public review and comment.

AJ32-2

Furthermore, the Joint Report indicates that the Final EIR might not state which GBIS alignment alternative will be selected. This is unacceptable. Failure to select the GBIS alignment in the Final EIR will create a cloud of uncertainty, could have an adverse affect on property values, and, therefore, may create significant adverse socio-economic impacts upon residents and businesses. There have already been many questions raised regarding real estate disclosures and the potential suppression of land values. Unless it is made clear which GBIS alignment alternative will be selected, this uncertainty will continue to plague our residents.

In conclusion, the Final EIR must select the environmentally preferred alternative, which is not the northern alignment or the hybrid alignment (Modified Alignment No. 1 in the Joint Report).

If you have questions for City of Burbank staff, please contact Rodney Andersen at (818) 238-3931.

Sincerely,


Mary J. Alvord
City Manager

c: Burbank City Council

H:\My Documents\GBIS\LA Sewer DEIR-Real Estate March 30 2006.docb

275 E. 4th Street, Suite 100 • Burbank, CA 91510 • (818) 238-5800 • FAX (818) 238-5804

Letter AJ32. Signatory – City of Burbank

Response to Comment AJ32-1

Refer to response to comment AJ31-5.

Response to Comment AJ32-2

Subsequent to the close of the public review period for the Draft EIR, the City staff identified Alternative 4 as the Recommended Alternative and is recommending its approval (see Section 1.5 of this Final EIR). As part of the Recommended Alternative, City staff is recommending the NEIS II West Alignment and the staff recommended GBIS Alignment, described in Section 1.5.2.1 and Section 1.5.2.2, respectively, of this Final EIR as "preferred" because these alignments have been determined to be less environmentally disruptive as a whole and best meet system needs (see Section 1.5 for further information on how the Recommended Alternative was chosen).

Regarding the comment about the Environmentally Superior Alternative, refer to response to comment AJ1-25.

CITY OF BURBANK
OFFICE OF THE CITY COUNCIL

1691

March 22, 2006

Jawahar P. Shah
City of Los Angeles
Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, California 90065

Dear Mr. Shah:

The City of Burbank (Burbank) has been informed that the City of Los Angeles is considering a new alternative additional alignment for the Glendale-Burbank Interceptor Sewer (GBIS) as a part of the Draft Environmental Impact Report (Draft EIR). It is our understanding that this new "hybrid" alignment would connect the eastern portion of the GBIS South Alignment along Forest Lawn Drive with the western portion of the GBIS North Alignment in Riverside Drive through Clybourn Avenue, Rose Street, or Pass Avenue. This hybrid alignment was not analyzed in the Draft EIR and cannot be considered as a legitimate alternative. The hybrid alignment must be rejected.

Essentially, this hybrid alignment would serve to bypass sparsely populated areas near the Lakeside Country Club in the City of Los Angeles and to route the GBIS through heavily developed commercial and residential areas in the City of Burbank. Thus, it would seem that the only reason for developing the hybrid alignment is to avoid impacts to the Toluca Lake area of the City of Los Angeles. The hybrid alignment does not avoid impacts; it shifts them from a Los Angeles neighborhood to Burbank neighborhood.

In the comment letter previously submitted by the City of Burbank, it was demonstrated that the GBIS North Alignment must be rejected due to the numerous adverse environmental impacts it would create. The data in the Draft EIR reveals that the GBIS South Alignment is far superior to the northern alignment. The City of Burbank continues to adamantly oppose all portions of the northern alignment and requests that the Final Environmental Impact Report properly characterize the entire northern alignment as an environmentally inferior alternative and urges the City of Los Angeles to reject this alternative.

Although this new hybrid alignment avoids many of the adverse impacts of the GBIS North Alignment, it is impossible to perform a comprehensive comparison between the GBIS South Alignment and the hybrid alignment without additional data and analysis. In particular, there is no data for the new route of this alignment through Burbank streets. Burbank is officially requesting that the City of Los Angeles prepare and recirculate a supplement to the Draft EIR in order to allow the public sufficient time to comment on the hybrid alignment. Burbank is requesting that the comment period for the supplemental Draft EIR be extended for a minimum of 90 days to review the new data that will be provided on the hybrid alignment.

Letter AJ36. Signatory – City of Burbank

Response to Comment AJ36-1

Refer to Section 1.5.2.2 of this Final EIR for a description of the staff recommended GBIS Alignment and a discussion of its impacts. In addition, refer to the responses to comment letter AJ13.

Response to Comment AJ36-2

Regarding the comment that the hybrid alignment (staff recommended GBIS Alignment) would shift potential impacts from communities in the City of Los Angeles to those in the City of Burbank, this is incorrect. As described in Section 1.5.2.2 of this Final EIR and in the responses to comment letter AJ13, the staff recommended GBIS Alignment comprises the eastern portion of the GBIS South Alignment and the western portion of the GBIS North Alignment. The western portions of both the GBIS South and North Alignments are located in the City of Los Angeles. The staff recommended GBIS Alignment would reduce the potential for impacts to communities in the City of Burbank when compared to the GBIS North Alignment by eliminating a substantial portion of sewer beneath Riverside Drive (in Burbank) and by avoiding the placement of construction shaft sites in areas near the City of Burbank. The staff recommended GBIS Alignment would primarily remain within boundaries of the City of Los Angeles, with the exception of a short section of tunnel beneath Pass Avenue. Contrary to the comment, the staff recommended GBIS Alignment would not shift impacts from the City of Los Angeles to the City of Burbank.

Regarding the comment that the City must characterize the GBIS North Alignment as environmentally inferior, refer to response to comment AJ3-12.

Response to Comment AJ36-3

Regarding the request to recirculate the Draft EIR, refer to the responses to comment AJ13-2 and AJ31-5.

Based solely upon the map provided by the City of Los Angeles, Burbank has serious concerns regarding the hybrid alignment and continues to support the GBIS South Alignment as the environmentally superior alternative. It appears as though the only benefit to the City of Los Angeles in regards to this hybrid alignment is that it shifts the adverse impacts of this project to Burbank residents instead of Los Angeles residents. Clearly moving problems from Los Angeles residents to Burbank residents is against the spirit of cooperation that our cities are striving to cultivate.

AJ36-4

Burbank's concerns regarding the hybrid alignment are discussed in detail in below.

General

The hybrid alignment proposes to use Clybourn Avenue, Rose Street or Pass Avenue to route the GBIS sewer from the Barham shaft site to Riverside Drive. Two of these streets, Clybourn Avenue and Rose Street are lined on both sides with residences. In contrast, the alignment along Valley Spring Lane only has residences on one side of the road for at least a portion of the route. Therefore, there is no environmental benefit to using the hybrid alignment over the south alignment in regards to proximity to residences.

AJ36-5

Section 3.4 – Air Quality

The Draft EIR describes potential significant adverse impacts to air quality resulting from the formation of odors by GBIS. The narrow residential streets that may be used under the hybrid alignment may be subject to these odors. As no analysis is provided by the City of Los Angeles to compare the air quality impacts of the GBIS South Alignment with the hybrid alignment, there does not appear to be environmental benefits to the hybrid alignment.

AJ36-6

Section 3.9 – Geology and Soils

Tunneling for either the northern, southern or hybrid alignment of the GBIS is expected to cause ground settlement that cannot be fully mitigated. The Draft EIR states that the settlement will be controlled by requiring the contractor to comply with a performance standard that limits settlement to less than 0.75 inch. The impacts to residential properties from three-quarter-inch settlement would be much more significant than to open space or golf courses. Utilizing narrow streets such as Clybourn Avenue or Rose Street will likely cause settlement to occur to residences along this route.

AJ36-7

The western portion of the North Alignment included a shaft location at the Riverside West site, while the South Alignment utilized a shaft at the Barham site. There must be some indication in the environmental document regarding the ability of the Barham shaft site to adequately serve the Hybrid Alignment and whether or not a new, hybrid shaft site would be required.

AJ36-8

In order to provide full and adequate disclosure of the impacts from the GBIS northern, southern and hybrid alignment options, the Geology and Soils Section must be revised to provide a comparative analysis of adverse settlement impacts that may result from implementation of any of the alignments and the ability of the Barham shaft site to serve the Hybrid Alignment.

AJ36-9

Section 3.13 – Noise and Vibration

Groundborne noise will be caused by muck trains during the tunneling operation. During a similar sewer project (NORS) previously constructed by the City of Los Angeles, groundborne

AJ36-10

Letter AJ36. Signatory – City of Burbank

Page 2

Response to Comment AJ36-4

Refer to response to comment AJ36-2 above.

Response to Comment AJ36-5

Comment noted. Section 1.5.2.2 of this Final EIR provides a detailed description of the staff recommended GBIS Alignment and the rationale for recommending this alignment for approval and implementation. As it noted in Section 1.5.2.2 of this Final EIR, there are currently two large diameter sewers within Valley Spring Lane, which could affect contingency response efforts.

Response to Comment AJ36-6

The staff recommended GBIS Alignment would connect the eastern portion of the GBIS South Alignment with the western portion of the GBIS North Alignment with a short section of tunnel beneath Pass Avenue. As noted in Section 1.5.2.2, maintenance hole structures would not be placed within Pass Avenue, and thus, there would be no potential for odors to be released along Pass Avenue. The potential for significant odor impacts from GBIS, as described in the Draft EIR, is related to the operation of air treatment facilities. Similar to the GBIS South Alignment, the staff recommended GBIS Alignment would not place air treatment facilities in or near the City of Burbank, as would occur under the GBIS North Alignment. In addition, the staff recommended GBIS Alignment would not place an air treatment facility at Woodbridge Park (the facility would be placed at the Caltrans Maintenance Yard Shaft Site), which would reduce odor impacts compared to both the GBIS North and South Alignments. Furthermore, the staff recommended GBIS Alignment would be constructed from the same shaft sites as identified for the GBIS South Alignment, thus, potential criteria air quality impacts of the staff recommended GBIS Alignment would be same as the GBIS South Alignment.

Response to Comment AJ36-7

As noted in Section 1.5.2.2 of this Final EIR, the staff recommended GBIS Alignment would not place a tunnel beneath Clyborne Avenue or Rose Street, rather, the short section of tunnel would be placed beneath Pass Avenue. In addition, mitigation measure GEO-MM-2 (described in the Draft EIR) establishes a performance standard that would limit surface settlement to 0.75-inch. GEO-MM-2 has been revised to include a goal to further limit surface settlement along the tunnel alignment to 0.50-inch (Section 2 of this Final EIR).

Response to Comment AJ36-8

As noted in Section 1.5.2.2 of this Final EIR, the staff recommended GBIS Alignment would be constructed using the same shaft sites as the GBIS South Alignment, including the Barham Shaft Site.

Response to Comment AJ36-9

Refer to the responses to comments AJ1-10 and AJ36-8.

Response to Comment AJ36-10

Comment noted. The staff recommended GBIS Alignment would not utilize the eastern portion of the GBIS North Alignment, and would therefore avoid tunneling activities beneath Riverside Drive in the City of Burbank which would reduce the number of single-family and multifamily residences that could experience groundborne noise effects, compared to the GBIS North Alignment. As noted in Section 1.5.2.2 of this Final EIR, vibrations charts generated by monitoring devices indicated that vibrations from normal surface vehicular traffic exceeded vibrations generated by recently completed NEIS tunneling operations (an earlier tunneling project). Despite this, groundborne noise and vibration control will be implemented in mitigation measures NV-MM-3, NV-MM-5, NV-MM-7, NV-MM-8, and NV-MM-9, as described in Section 3.13 of the Draft EIR (and summarized in Table ES-1 of the Draft EIR and this Final EIR). The potential environmental impacts (such as noise and vibration impacts on adjacent land uses) were used in determining the staff recommended GBIS Alignment (refer to Section 1.5.2.2 of this Final EIR).

noise from muck train operations was a major source of community complaints.¹ Comparison between the two alignments in the Draft EIR yields the following table:

| Data from Page 3.13-79 and 3.13-83 Groundborne Noise Levels Greater than 45 dBA Caused by Tunnel Construction | | | | |
|------------------------------------------------------------------------------------------------------------------|------------------|-----|---------------|-------|
| Alignment | Residences | | School/Church | Other |
| | SFR ^a | MFR | | |
| South Alignment | 101 | 13 | 1/0 | 3 |
| North Alignment – Option A | 126 | 246 | 6/2 | - |
| North Alignment – Option B | 102 | 168 | 2/2 | - |

^a SFR: single-family residence
MFR: multi-family residence

As this table shows, groundborne noise levels under the GBIS North Alignments impact over 150 more multi-family residential buildings than the GBIS South Alignment. Considering that each multi-family residence can house dozens of people, there can potentially be thousands of people disturbed by groundborne noise levels if either of the GBIS North Alignment alternatives is chosen.

This important noise impact comparison is not available for the hybrid alignment. It may be assumed that since a significant portion of the southern alignment travels under a golf course, noise impacts would be less than along the streets proposed in the hybrid alignment. Therefore, it appears that the southern alignment creates less adverse environmental impacts than the hybrid alignment.

Environmental Justice

While not a mandatory section of a CEQA document, Environmental Justice should be a consideration of the lead agency. The National Environmental Policy Act, (NEPA) includes requirements for assessing the income levels and ethnicity of persons affected by the environmental impacts of projects. Four federal agencies are listed in the Draft EIR as having some approval authority over the proposed projects, including funding by the Bureau of Reclamation. The EIR therefore, may need to serve as a federal NEPA document. In light of the increased numbers of residents affected by the noise, air pollution, and other impacts of the Hybrid Alignment, it is reasonable to request that this EIR also assess the socio-economic and racial characteristics of the affected populations.

Summary and Conclusion

The City of Burbank believes that the hybrid alignment, now incorporated in the Draft EIR with no data or analysis, must be rejected. The Draft EIR fails to disclose and analyze all potentially significant adverse environmental impacts of the GBIS hybrid alignment. Further, the Draft EIR fails to provide a comparative analysis of the significant adverse impacts of the GBIS alignment alternatives. Such an analysis will clearly show that the GBIS South Alignment is

¹ Integrated Resources Plan – Draft Environmental Impact Report, page 3.13-69.

Response to Comment AJ36-11

Comment noted. The staff recommended GBIS Alignment would essentially replace the section of tunnel beneath Riverside Drive associated with the GBIS North Alignment with a short section of tunnel beneath Pass Avenue. The staff recommended GBIS Alignment would result in less of a potential to affect residences from groundborne noise and vibration than the GBIS North Alignment because there are fewer single-family and multifamily residences along the section of Pass Avenue (associated with the staff recommended GBIS Alignment) than the section of Riverside Drive in the City of Burbank associated with the GBIS North Alignment that the Pass Avenue section would replace. The staff recommended GBIS Alignment would result in slightly greater potential to affect residences than the GBIS South Alignment, because although it would use the western portion of the GBIS North Alignment, Optional Alignment A, which has a greater number of multifamily residences (along Riverside Drive) than the western portion of the GBIS South Alignment (along Valley Spring Lane). In addition, refer to response to comment AJ36-10. In addition, as noted in Section 1.5.2.2, the staff recommended GBIS Alignment would use the western portion of the GBIS North Alignment for contingency response reasons.

Response to Comment AJ36-12

Comment noted. Section 3.8 of the Draft EIR discusses the anticipated impacts of the Project Alternatives and their potential to disproportionately affect low income or minority populations. As noted in Section 3.8 of the Draft EIR, neither a minority nor low income population, would be disproportionately affected by GBIS.

Response to Comment AJ36-13

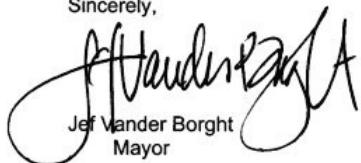
Refer to Section 1.5.2.2 of this Final EIR for a description of the staff recommended GBIS Alignment, its anticipated impacts, and the rational for recommending this alignment for implementation. In addition, see response to comment AJ1-25, response to comment letter AJ13, and response to comment AJ31-1.

environmentally superior to the GBIS North Alignment and certainly superior to the hybrid alignment also. In light of CEQA's mandate that a public agency should not approve a project where feasible alternatives would substantially lessen significant environmental impacts (14 Cal. Code Regs. § 15021), the City of Burbank urges the City of Los Angeles to reject the GBIS North Alignment and the hybrid alignment.

Further, a supplemental Draft EIR must be prepared and recirculated for public review and comment after all revisions are made because substantial new information will be required to address the City's comments set forth in this letter (see 14 Cal. Code Regs. § 15088.5). Failing to recirculate the Draft EIR after it is revised to: identify the preferred alternative, preferred GBIS alignment and environmentally superior alternative, and to adequately address impacts related to air quality, environmental justice, geology and soils, noise, will deprive the public of a meaningful opportunity to review this new information.

If you have questions for City of Burbank staff, please contact Rodney Andersen at (818) 238-3931.

Sincerely,



Jeff Vander Borgh
Mayor



Dave Golonski
Council Member



David W. Gordon
Council Member



Marsha R. Ramos
Council Member

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Letter AJ36. Signatory – City of Burbank

Page 4

Response to Comment AJ36-14

Refer to the response to comment AJ1-25.

Response to Comment AJ36-15

Refer to the response to comment AJ1-25.



Alan C. Lloyd, Ph.D.
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

Maureen F. Gorsen, Director
1011 North Grandview Avenue
Glendale, California 91201



Arnold Schwarzenegger
Governor

1888 3/28/06

March 22, 2006

Mr. Ara Kasparian
City of Los Angeles
650 S. Spring Street, Room 574
Los Angeles, California 90014

NOTICE OF COMPLETION OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE INTEGRATED RESOURCES PLAN, SCH NO. 2004071091

Dear Mr. Kasparian:

The Department of Toxic Substances Control (DTSC) has received your Notice of Completion of draft Environmental Impact Report (EIR) for the project mentioned above.

Based on the review of the document, DTSC comments are as follows:

If during construction of the project, soil contamination is suspected, construction in the area should stop, and appropriate health and safety procedures should be implemented. If it is determined that contaminated soils exists, the EIR should identify how any required investigation and/or remediation will be conducted, and which government agency will provide regulatory oversight.

AJ39-1

DTSC provides guidance for Preliminary Endangerment Assessment preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact Mr. Alberto Valmidiano, Project Manager, at (818) 551-2870 or me at (818) 551-2973.

AJ39-2

Sincerely,

Jennifer Jones
Unit Chief
Southern California Cleanup Operations Branch – Glendale Office

cc: See next page

Printed on Recycled Paper

Letter AJ39. Signatory – Department of Toxic Substances Control

Response to Comment AJ39-1

As described in detail in Section 3.10 of the Draft EIR, contaminated soil and groundwater could be encountered during the installation of the Project Alternatives and components. As discussed in Section 3.10.3.2 and Section 3.11.3.2 of the Draft EIR, potential hazards from encountering contaminated soil and groundwater would be sampled and disposed of in accordance with all applicable health and safety plans (i.e., per CalOSHA standards for worker safety), permit requirements (i.e., NPDES permit), and in accordance with all applicable federal, state and local regulations, which could include matters under the purview of DTSC, as applicable, in order to protect people and the environment. In addition, as described in Sections 1.2.2 and 3.1.2 of the Draft EIR, program-level components are projects that would be implemented as part of the IRP, but these projects do not have specific locations or design details identified. Therefore, after project-specific information has been developed for a program-level component from the adopted and certified Alternative, that project will be subject to subsequent environmental analysis and additional future environmental review that will include the required and appropriate investigations, including any necessary to determine if contaminated soil exists in the affected area.

Response to Comment AJ39-2

Thank you for providing information on your Voluntary Cleanup Program and for the offer to meet with staff to discuss the matter.

Mr. Ara Kasparian
March 22, 2006
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